

PHILIP M. HYMANSON, ESQ.  
 Nevada State Bar No. 2253  
 HENRY JOSEPH HYMANSON, ESQ.  
 Nevada State Bar No. 14381  
 HYMANSON & HYMANSON  
 8816 Spanish Ridge Avenue  
 Las Vegas, NV 89148  
 (702) 629-3300 Telephone  
 (702) 629-3332 Facsimile  
 Phil@HymansonLawNV.com  
 Hank@HymansonLawNV.com

*Attorneys for TEVA PARENTERAL MEDICINES, INC.,  
 formerly known as SICOR PHARMACEUTICALS, INC.;  
 SICOR, Inc.; BAXTER HEALTHCARE  
 CORPORATION; McKESSON MEDICAL-SURGICAL  
 INC.*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

ABADJIAN, SOSSY; ACKERMAN,  
 GLORIA; ADARVE, VIRGINIA; ADLER,  
 FRANCIS; AGUILAR, CARMEN;  
 AGUILAR, NARCISO RENE; ALDER,  
 RHEA; ALLEN, GEORGE; ALLSHOUSE,  
 SOCORRO; ALPY, LINDA; ALVAREZ,  
 JOYCE; ANDERSON, REBECCA L.;  
 ANDREI, EMANUEL; ANTLES, TERRIE;  
 APPLETON-HULTZ, KELLIE;  
 ARCHULETA, ANTHONY; ARELLANOS,  
 ESTEBAN; ARIAS, RICKIE; ARKENBURG,  
 MARK; ARRIOLA, ROGER; ARTIGA,  
 MARIA; ASBERRY, ROBIN; BABCOCK,  
 WINIFRED; BACH, ROBERT; BACHAND,  
 SUSAN F.; BAGLEY-TENNER, ELAINE;  
 BAL, MELISSA; BALDRIDGE, BRYAN;  
 BARBEE, DOROTHY; BARKER, RONALD;  
 BARNCORD, RONALD; BARNES,  
 RUSSELL; BARNHART, PEGGY JO;  
 BARRALL, MADALYN; BARTLETT,  
 DONALD; BARTLETT, SHERYLE;  
 BAUDOIN, JOSEPH; BAXTER, BARBARA;  
 BEAMON, VENUS; BEATTY, BARBARA  
 ROBIN; BEHLINGS, RODNEY; BEJARAN,  
 CRISTINA; BENEDETTI, TOMAS;  
 BENFORD, VERA; BENKERT,  
 RICHARD; BERGERON, MARSHALL;  
 BERGERON, DONNA; BIVONA, SYLVIA;  
 BLAIR, ROBERT; BLAKELEY, HARRY;

CASE NO.:

**NOTICE OF REMOVAL**

1 BLANCHARD, DAWN; BLOSS, BONNIE;  
2 BOLAR, DARRELL; BOLDEN, ROY;  
3 BOLDEN, SARAH; BOLEN, SCOT;  
4 BONILLA, VICTOR; BOONE, JOHN;  
5 BORRAYES, GRACIELA; BOWEN, BILLY;  
6 BOWERS, SHIRLEY; BOWLES, BRIDGET;  
7 BOYKINS, CATHY; BRADFORD,  
8 BRENDA; BRADLEY, SHIRLEY; BRAUER,  
9 CARLA; BROWN, CAROLYN; BROWN,  
10 JACK; BROWN, KENNETH; BROWN,  
11 LESLIE; BROWN, MICHAEL; BROWN,  
12 ROBERTA; BRUNS, AMELIA B.;  
13 BURCHARD, CARL L.; BURKS, TRACI;  
14 BURTON, ELIZABETH; BUSTAMANTE-  
15 RAMIREZ, ANGELITE; BUSTAMANTE,  
16 ANASTASIO; BUSTAMANTE, MARIO;  
17 BUTLER, DOROTHY ANN;  
18 CALCATERRA, LEE; CALDERON,  
19 ROBERT; CALLAHAN, SHEILA;  
20 CAMPBELL, EVELYN; CAMPOLO, JOHN;  
21 CAMPOS, MARIA; CANACARIS,  
22 BOONYUEN; CANACARIS,  
23 CONSTANTINOS; CAPANDA, MELISSA;  
24 CAPERELL, MARTIN; CARDONA, JAIME;  
25 CARDONA, PEDRO; CARNEY, SUSIE;  
26 CARPENTER, JOHN; CARR, LESTER;  
27 CARR, TERESA; CARRASCO,  
28 BERNARDINO; CARTER, TRUMAN;  
CASTO, XANDRA; CAUDLE, SPENCE;  
CAUSEY, MARGARET; CEBALLOS,  
XAVIER; CEDENO, ROBERT; CELANO,  
HELAYNE; CELANO, VINCENT;  
CENTENO, DINORA; CEPEDA,  
GUADALUPE; CHASE, ROY; CHEA,  
CARIDAD; CHEVEZ, ELSA; CHIGER,  
MARK; CHILDS, LUCILLE; CIRCLE,  
DONALD; CLARK, ALICIA; CLARK,  
CAROL; CLARK, PATRICIA; COIRO,  
RICHARD COLLINS, PERCELL JR.;  
COMPTON, ROBERT; CONNER, ERNEST;  
COOK, CLIFF; COREY, SUSAN; CORREA,  
PATRICIA; COULOMBE, PAUL A.;  
CRAWFORD, AMBER; CROCKER,  
RONALD; CROCKETT, PAMELA; CROSS,  
HOWARD; CROSSLEY, ROSSLYN;  
DANIELS, WILLIAM R.; DAVIS, EVELYN;  
DAVIS, MARY JEAN; DAVIS, VIRGINIA  
A.; DAWSON, JESSIE L.; DELACRUZ,  
DENISE M.; DELACRUZ, EMELYN;  
DERAS, SILVIA; DEROSE, GREGORY;  
DEVINE, SHERIDA; DIAMOND, CLAIRE;  
DIAZ-PEREZ, JOSE; DIPIETRO, MARK;  
DIXON, OTIS L.; DOLPIES, EMILIO;  
DOMINGO, TAMARA; DOMINGUEZ,  
PAMELA; DOMKOSKI, EUQENA;

DONATO, JOSEPH; DONIS, HUGO;  
DONLEY, PATRICIA L.; DRAGANIC,  
LJUBICA; DUCK, DELORIS K.; DUHS,  
KATHLEEN J.; DUNCAN, LILLIAN;  
DUSYK, HAROLD; DYER, ALLYSON R.  
JR.; EASLEY, LOIS; ECHEVERRIA, DEISY;  
EDMOND, DONNEDIA D.; ELAURIA,  
ROLAND E.; ESCALA, DARIO E.;  
ESCALA, ENGARCIA B.; ESCALERA,  
KATHY A.; ESCOBEDO, MARIA.  
ESPINOSA, TERESA I.; ESPOSITO,  
ERNEST A.; EVANS, LEON; EVANS,  
WILLIAM; EVERSOLE, JOHN J.;  
FAULKNER, MARY; FEINGOLD,  
ABRAHAM; FEINGOLD, MURIEL;  
FENNELL, OSCAR; FERGUSON,  
MARIETTA; FERGUSON, WILLIE;  
FERRANTE, DANIEL; FICKLIN,  
CAROLYN; FILBECK, JOE; FINEBERG,  
ETHEL; FINN, MADELINE C.; FITCH,  
ALBERT L.; FLORES, ADRIAN; FLORES,  
MARIA; FOLKENFLIK, RONALD;  
FOREMASTER, RAUNA; FOSTER,  
JOSEPH E.; FOSTER, PHYLLIS G.;  
FRAZIER, CYNTHIA D.; FREEMAN,  
VICTORIA; FRIEL, LAWRENCE; FRIESEN,  
BONITA M.; FRILLARTE, NESS; FRISBY,  
NANCY C.; GAINES, JODI; GALLEGOS,  
ESPERANZA; GALLEGOS, NEOHMI;  
GARAY, LUIS; GARCIA, BRENDA;  
GARCIA, MARTHA; GARDNER, SANDRA;  
GARVEY, MICHAEL; GASS, LOIS;  
GELLENS, JEREMY; GEOGHEGAN,  
MARION; GEORGE, THERESA;  
GIANNOPOULOS, TINA;  
GIANNOPOULOS, ARIS; GILBERT,  
WANDA; GLENN, GREGORY; GOLDEN,  
JEAN; GOLDEN-LEWIS, TYRA; GOLOB,  
LUCIANO; GOMEZ; CARRILLO,  
MARGARITO; GONZALES, PASTOR;  
GONZALEZ-TORRES, JESUS; GORDY, TJ;  
GOTLIEB, JEFF; GOUDY, ALLEN;  
GRAHAM, ANNETTA; GRATTAN, BILL;  
GRAY, ARNOLD; GRAY, BONNIE;  
GREEN, DOROTHY; GREEN, TANIA;  
GREGORICH, ROY; GRESSER, JEFFREY;  
GRIFFIN, WILLIE; GRIMBLot, ROBERT;  
GRIMES, VERNIA; GRIMM, CYNTHIA;  
GRIMM, ROBERT; GRONNA, PATRICK;  
GUERETTE, CARL; GUEVARA,  
CANDELARIO; GULLI, NICHOLAS;  
GUTIERREZ, JULIA; HACHEZ, DENISE F.;  
HADJES, SUE; HAL, ESTHER I.; HALL,  
FRANK J.; HALL, TINA; HAMBLIN,  
CHARDAI C.; HAMILTON, ROBERT JR.;

HYMANSON & HYMANSON  
8816 Spanish Ridge Avenue  
Las Vegas, NV 89148  
702.629-3300

1 HANCOCK, DEBORAH; HARO, JESSICA  
2 M.; HARPER, JOANN; HARRINGTON,  
3 ANNA C.; HARRINGTON, MICHAEL S.;  
4 HARRIS, DORIS; HARRISON, GLORICE;  
5 HARRISON, SHARA; HARRISON-  
6 CARTER, PATRICIA; HARSHMAN-  
7 TALBERT, BRIANNA S.; HARTLEY,  
8 RONALD K.; HARWOOD, ROBERT;  
9 HAUGEN-RATTAZZI, LINDA K.;  
10 HAYASHI, ESTHER A.; HAYES, SAMUEL;  
11 HEIN, SUSETTE A.; HENDERSON-  
12 SHEPHERD, NITA; HENNICK, ROY M.;  
13 HENSON, JUANITA; HEREDIA, LUCIA;  
14 HERNANDEZ, CANDIDO; HERNANDEZ,  
15 MARCIAL A.; HERNANDEZ, MARIA;  
16 HERROLD, THOMAS; HERRON, LUZ;  
17 HILL, SUSAN M.; HINER, ISHEKA;  
18 HOARD, ARLENE; HOBBS, BETH;  
19 HOLLIS, MICHELLE; HOLMES,  
20 JAQUELINE A.; HOOKER, JOSHUA;  
21 HOOVER, WILLIE; HOPPINS, PATRICIA;  
22 HORVATH BELVIA; HORVATH, JAMES;  
23 HOSTLER, ANA; HOULE, AUGUSTAVE;  
24 HOVIETZ, CARL II; HOWARD, RUTH;  
25 HOWELL, ROBERT E.; HOWFORD,  
26 MICHELE; HUEBNER, EDWARD L.;  
27 HUGHES, LOVETTE M.; HUNTER,  
28 VIRIGINIA M.; HURTADO-MIGUEL,  
PATRICIA; HWANG, HO NAN; HYYPPA,  
ANGELA; IBARRA, JANETTE; INFUSO,  
JOSEPH; INTERDONATI, FRANK; IREY,  
BRIAN; JACKSON, BARRY; JACKSON,  
CECIL; JACKSON, DORA; JARAMILLO,  
ROLANDO; JILES, RICHARD; JILES,  
LETHA; JOHNSON, CLIFTON; JOHNSON,  
DORIS; JOHNSON, EUGENE; JOHNSON,  
JOHNNY; JOHNSON, JOYCE; JOHNSON,  
WILLIAM; JONES, ARNOLD;  
KABADAIAN, ANN; KALETA, ANTHONY  
K.; KAPOOR, ARUN; KEELER, LINDA J.;  
KEELING, SHARON; KELLY, MICHAEL  
F.; KEYES, RAYANN J.; KIDD , DARRELL;  
KIM, CONNIE; KIM, SOO-OK; KIM,  
TAESOOK; KIMBERS, SONDRAL.;  
KINDLER, ELIZABETH I.; KING, IRIS L.;  
KING, LARRY D.; KOCEJA, RAYMOND  
E.; KOENEN, TRACEY; KOENIG,  
JOANNA; KOH, PATRICK; KOPANSKI,  
MICHAEL; KRACHENFELS, MICHAEL J.;  
KRAMER, CORINNE M.; KROITOR,  
DAVID; KUNIK, OLGA; KUNZIG, KAREN  
A.; LAFOUNTAIN, ANEITA; LAKE,  
BARBARA; LAMPMAN, KRYSTAL;  
LANG, DARSEL; LARSON, JONATHAN;  
LAUREL, BERTHA; LAURON, ANGES G.;

HYMANSON & HYMANSON  
8816 Spanish Ridge Avenue  
Las Vegas, NV 89148  
702.629-3300

1 LAWSON, MARIE; LEBLANC, PHYLLIS;  
2 LEEMAN-ROSS, BETTY J.; LETANG,  
3 ARLENE; LEV, JANE; LEWIS, JAMES A.;  
4 LIEBSCHUTZ, JOAN; LIM, MINERVA L.;  
5 LINES, DEBRA; LINDSEY, EDWARD;  
6 LINETSKY, SETH; LISTA, EMILIO D.;  
7 LITTLE, WILLIAM; LIVINGSTON-STEEL,  
8 DOROTHY; LOPEZ, FELISA; LOPEZ,  
9 IRAIDA; LOPEZ, MARTHA; LOPEZ, NOE;  
10 LOPEZ, TONEY E.; LOPRESTO,  
11 FRANCINE R.; LUCAS, FLORENCE;  
12 LUTHER, DARLENE; LYLES, FRANK L.;  
13 MACLEAN, STERPHANIE; MADRID,  
14 DEBORAH; MAGILL, LORI; MAIWAND\*\*,  
15 MARWA; MAJOR, DOROTHY J.;  
16 MALDONADO, MARGUERITE;  
17 MALDONADO, MARIO; MALWITZ, IDA;  
18 MANUEL, AUDREY; MARES, GABRIEL;  
19 MAROHL, ROBERT; MARQUEZ, CAROL  
20 A.; MARTIGANI, BRENDA; MARTIN LEE,  
21 TERRI L.; MARTIN, LEONARD A.;  
22 MARTIN, TERRI L.; MARTINEZ, HUGO;  
23 MARTINEZ, JORGE B.; MARTINEZ, JOSE;  
24 MARZULLI, GRACE; MASCARI, MARY  
25 LOUISE; MASTRIAN, LUCY; MATTI,  
26 FATIN; MAYS, LEROY; MAYS, LISA;  
27 MCCALL, TERRY; MCCALL, VIRGINIA  
28 A.; MCCLAIN, LETTA; MCCLINTON,  
ALFRED; MCCRAY, STELLA;  
MCDANIEL, LAURENCE; MCDAVID,  
JOHN JR.; MCDONALD, DAVID;  
MCDONNELL, DOLORES; MCGEE,  
DENISE ANNE; MCKINNEY, MAE;  
MCKNIGHT, JANET; MCMILLEN, FRED  
III; MEACHAM, MYRON; MEJIA,  
KELLEY; MEKHJIAN, AIDA A.; MELLOR,  
CHELSEY L.; MENDOZA, JIGGERSON;  
MERRELL-CLAPP, SUSAN; MIDDAUGH,  
JAMES; MILBURN, SYLVIA; MILLER,  
CORINNE; MITCHELL, GERALD;  
MITCHELL, JANICE; MITCHELL,  
OLIVER; MIZHIRITSKY, MIKHAIL;  
MOLITOR, KIRK; MOODY, STEVEN;  
MOORE, MARY; MORA, JOSE; MORALES,  
YOLANDA; MORALES; CASTRO,  
ELIZABETH; MORCIGLIO, YOLANDA;  
MORENO, BIVETTA; MORGAN, DAVID;  
MORGAN, DENISE M.; MORGAN,  
DOUGLAS; MORGAN, SONIA; MORICI,  
ANDREW; MORRIS, BARRY; MORRIS,  
JAMES; MORRIS, JUANITA E.; MORSE,  
MICHELE; MORTENSEN, DAN R.;  
MOSQUEDA, MIGDALIA; MOTOLA,  
ANDREA; MUNA, ANNIE; MUNGER,  
JUDITH A.; MUNGUIA, LUCILA;

HYMANSON & HYMANSON  
8816 Spanish Ridge Avenue  
Las Vegas, NV 89148  
702.629-3300

1 MURANYI, DIANE MURRAY, WILLIE;  
2 MUSCARA, DIOSELINA; NAGY, JOSEPH;  
3 NAJARRO, JOSE A.; NAKONECZNY,  
4 BONNIE; NANOD, THANG; NATINGA,  
5 ERLINDA; NAVARRO-ORTIZ, MARIA;  
6 NELSON, LEEANNE; NEVINS, DANIEL;  
7 NEWELL, LANITA; NOGA, PAUL;  
8 NORLIN, ROSEMARIE; NOVOTNY,  
9 RONALEE; NYDEN, MARSHALL;  
10 OBERSHAW, WADE; O'CONNELL,  
11 JOSEPH; O'FARRIL, LUCIO F.;  
12 O'HALLORAN, SHAWN; OKU, ANDREW;  
13 OLIVA, DIGNA; O'MARA, JOHN; O'NEAL,  
14 NORMA J.; ORCULLO, LINDA; OROZCO-  
15 GALAN, PAULA; PACHECO, ANGELA;  
16 PANKHURST, DENIS; PARATORE, MATT;  
17 PARK, ROBERT; PARKINSON, KATHY;  
18 PAZOS, JESUS; PEARCE, MARILYN;  
19 PECCORINI, TERESA; PEDRO, PHYLLIS;  
20 PENA, JOSE O.; PEOPLES, PATRICIA;  
21 PERDOMO, DELMY C.; PEREZ, DORA;  
22 PEREZ, LOUISE; PEREZ, LUIS; PEREZ,  
23 MARIA; PEREZ, MERCEDES; PEREZ-  
24 ROQUE, AGUSTIN; PERRET, ANDRE;  
25 PERRY, JANET P.; PETERSON, ALAN K.;  
26 PHILIP, LOWELL; PHILIP, MICHELLE;  
27 PICARD, CRAIG; PINSKER, DONALD;  
28 PITMAN, JASON B.; PITTMAN, WAYNE;  
PODROUZEK, JEFF; POLILLO, ROGER;  
POLINSKI, RON; PORTER, JUDY;  
POURTEYMAUR, MOHAMMED;  
POWERS, DONNA; POWERS, EVA;  
POWERS, JENNIFER; PRICE, DOUGLAS;  
PRICE, IVOR; PRIETO, JOSE; PRIETO,  
LUISA; PRUSSIN, ELY; QUINTERO,  
FRANCISCO; QUIROZ, ANTHONY RAY;  
RABADAN, MARIBEL; RAGAZZO,  
MARIO; RAMIREZ, ADRIANA;  
RAMIREZ, JOHN; RAMIREZ, RAUL;  
RANSOM, EDWARD; RAPOSA, ROBERT;  
RATTAZZI, DEVIN; REDDING, CANTICE  
M.; REED, KAREN; REYES, HELEN;  
REYES DE MEDINA, CELIA; REYES,  
GABRIEL; REYES, MIGUEL; RICE,  
MICHAEL; ROBERSON, LESTER;  
ROBERTS, BARBARA; ROBINSON,  
CONSTANCE; ROBINSON, LLOYD H.;  
ROBY, CONNIE; ROCHESTER,  
ANTOINETTE; RODGERS, VICKI;  
RODGERS, TREVA; RODRIGUEZ, MARIA;  
RODRIGUEZ, NENITA; RODRIGUEZ,  
RICARDO; RODRIGUEZ, YOLANDA;  
RODRIGUEZ-RAMIREZ, JOSE; ROGERS,  
FREEMAN; ROGGENSEE, CAROLE;  
ROJAS, SONIA; ROMANO, JOSEPH;

ROSE, JEAN; RUCKEY, GWENDOLYN;  
RUSSELL, ROSETTA; SADDLER,  
DEMETRY; SALAS, JANISANN;  
SALCEDO, MARIA; SALGUERO,  
FRANCISCO; SANDERS, KERRI;  
SANDERS, LOVIE; SAUNDERS, PAUL;  
SAUNDERS, SHERRILYN; SAWYER,  
DANNY; SCHILLING, ISA; SCHLAPPI,  
SHAUN; SCHROEDER, STEPHEN;  
SCHULMAN, JEFFREY; SEAY, RAY;  
SENNESS, SANDRA; SERGIO, ANTHONY  
JR.; SFORZA, MAURICE; SHANKLIN,  
SYLVIA; SHANKS, JULIE; SHEARER,  
DOUGLAS; SIMKO, SANDRA; SIPPLE,  
MYRTLE; SKINNER, CHARLES; SLATER,  
JAMES; SLAUGHTER, JACKLYN;  
SLAUGHTER, JOHN; SLONE, JOHN;  
SMITH, CATHERINE; SMITH, WILBUR;  
SNYDER, LILA; SOBIESKI, DOLORES;  
SOCORRO, MICHELLE; SOMMER,  
WAYNE; SOTO, MARIA; SOUSSANA,  
VIDANA; SPAINHOUR, JULIE;  
SPANGLER, JESSICA; SPARKS,  
PATRICIA; SPARKS, SANDRA;  
SPELLMAN, PATRICIA; STANFORD,  
JEFFREY; STANKARD, WILLIAM;  
STANLEY, GINGER; STEWART,  
RODNEY; STOKLOSA, WALTER;  
STROHECKER, LETICIA; STROMGREN,  
HAROLD; SUDO, MAFALDA; SWAIN,  
BARBARA; TADEO, NORMA;  
TARNOWISKI, MIRKA; TARNOWSKI,  
RYSZARD; TASH, ROXANNE E.;  
TAYLOR, JILL; THIBEAULT, JEANNE;  
TITUS-PILATE, CATHERINE; TOPPLE,  
RAYMOND; TORIBIO, DOMINGA;  
TORRES, YADEL; TOWNSLEY, RITA M.  
TRAFTON, ROSELYN; TROMELLO,  
SALVATORE; TROPP, PATRICIA A.;  
TUCKOSH, DOROTHY; TURNER, LUCY;  
TURNER, TERRY; TUZINSKI, ROBERT;  
UNRUH, WILLIAM; VALLS, JESUS;  
VALONE, DIANNE; VANCE, GILBERT;  
VANDERGAAG, HILLEGONDA; VELEY,  
HENRY; VILLEGAS, STELLA; VIRGIL,  
LOUIS; VITAL-CEDENO, CECILIA; VOLK,  
COLLEEN; VORGIAS, CHRIST;  
WADLOW, WILLIAM; WAGNER, BETTY;  
WALTERS, JOHN; WALTON, JASON;  
WAMPOLE, JANICE; WARD, BARBARA;  
WARD, GLORIA; WARIS, SANDRA;  
WATKINS, ELIZABETH; WEDDINGTON,  
LESTER; WEISNER, ARLENE; WHEELER,  
KATHRYN; WHITE, DEBRA; WHITE,  
FRANK E.; WHITE, SERENE; WHITE,

SHARON; WILKINS, BRIDGET;  
WILLIAMS, ACE K.; WILLIAMS,  
ANTHONY; WILLIAMS, AUBREY;  
WILLIAMS, CHARLES; WILLIAMS,  
CHERYL; WILLIAMS, MARY; WILLIAMS,  
REALINDA; WILLIAMS, WILLIE;  
WILSON, GARY; WILSON, ROBERT;  
WILT, STEVEN; WINSLOW, ANGELA;  
WINTEROWD, BEVERLY; WINTERS,  
BETTY; WOLF, JAMES; WORTHY,  
DEREK, individually,

Plaintiffs,

v.

TEVA PARENTERAL MEDICINES, INC.,  
formerly known as SICOR  
PHARMACEUTICALS, INC.; SICOR, Inc., a  
Delaware Corporation; BAXTER  
HEALTHCARE CORPORATION,  
a Delaware Corporation; McKESSON  
MEDICAL-SURGICAL INC., a Delaware  
Corporation,

Defendants.

**TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA**

Defendants TEVA PARENTERAL MEDICINES, INC. (“TPM”), formerly known as  
SICOR PHARMACEUTICALS, INC.; SICOR, Inc.; BAXTER HEALTHCARE  
CORPORATION (“BAXTER”); McKESSON MEDICAL-SURGICAL INC. (“MCKESSON”)  
(collectively “Defendants”) hereby notice the removal of this action to the United States District  
Court, and, in support thereof, state as follows:

1. Defendants are the defendants in the above-entitled action commenced in the Eighth  
Judicial District Court, in and for Clark County, Nevada, as Case No. A-18-781820-C, and now  
pending in that court (“State Court Action”).

2. Plaintiffs commenced the State Court Action by filing a complaint (“Complaint”)  
on September 27, 2018.

3. Service of the Complaint upon Defendant TEVA PARENTERAL MEDICINES,  
INC., formerly known as SICOR PHARMACEUTICALS, INC. was effected on November 21,

2018. Service of the Complaint upon Defendant BAXTER HEALTHCARE CORPORATION was effected on November 20, 2018. Service of the Complaint upon Defendant McKESSON MEDICAL-SURGICAL INC., was effected on November 21, 2018. Service has not been effected on Defendant SICOR, Inc.

4. The Complaint alleges claims for 1) strict product liability; 2) breach of the implied warranty of fitness for a particular purpose; 3) negligence; 4) violation of the Nevada deceptive trade practices act; and 5) punitive damages. Plaintiffs pray for relief for general damages, “in excess of \$15,000.” Plaintiffs also pray for unspecified special damages according to proof, attorney’s fees and costs, and punitive damages according to proof.

5. No further proceedings have been had in this matter in the Eighth Judicial District Court.

6. Thirty days have not elapsed since Defendants were served with the complaint in this action.

#### **DIVERSITY OF CITIZENSHIP**

7. This Court has original jurisdiction pursuant to 28 U.S.C. § 1332(a) and this action may be removed to this Court by Defendants pursuant to 28 U.S.C. §1441(a) and (b) in that it is a civil action between citizens of different states and the matter in controversy exceeds the sum of \$75,000 for each plaintiff, exclusive of interests and costs.

8. Defendants TEVA PARENTERAL MEDICINES, INC., formerly known as SICOR PHARMACEUTICALS, INC., and SICOR, Inc. are incorporated in the State of Delaware, with its principal place of business in the State of California;

9. Defendant BAXTER HEALTHCARE CORPORATION, is incorporated in the State of Delaware, with its principal place of business in the State of Illinois;

10. Defendant McKESSON MEDICAL-SURGICAL INC., is incorporated in the State of Virginia, with its principal place of business in the State of Virginia.

11. Plaintiffs (“Plaintiffs”), are listed in the Complaint as residents of Clark County, Nevada.

12. Based on information and belief, there is now and there was at the time of the commencement of this action complete diversity between Plaintiffs and Defendants.

13. The sum of the damages alleged by Plaintiffs necessarily exceeds \$75,000 for each plaintiff, exclusive of interest and costs.<sup>1</sup> Specifically, Plaintiffs are seeking punitive damages. “Punitive damages may be considered in determining the requisite jurisdictional amount.” *Woodman of the World Life Ins. Soc’y v. Manganaro*, 342 F.3d 1213, 1218 (10th Cir. 2003).

14. Based on the above, adequate grounds exist to remove the Complaint to this Court based on diversity of citizenship pursuant to 28 U.S.C. § 1332(a).

### **FEDERAL QUESTION JURISDICTION**

15. This Court may additionally and/or alternatively exercise jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 and 1367. Plaintiffs’ claims are removeable because they necessarily raise a substantial and disputed question of federal law. In addition, all remaining claims are removable subject to the Court’s supplemental jurisdiction.

16. The Supreme Court has held that state-law claims are removable under federal question jurisdiction pursuant to 28 U.S.C. § 1331 where they “necessarily raise a stated federal issue, actually disputed and substantial, which a federal forum may entertain without disturbing any congressionally approved balance of federal and state judicial responsibilities. *Grable & Sons Metal Prods., Inc. v. Darue Eng’g & Mfg.*, 545 U.S. 308, 314 (2005).

17. Federal jurisdiction exists where a state law claim necessarily involves the construction or application of federal law. *See, e.g. D’Alessio v. New York Stock Exchanging, Inc.*, 258 F.3d 93, 99 (2d Cir.2001)( “[A] case is deemed to ‘arise under’ federal law ‘where the vindication of a right under state law necessarily turn[s] on some construction of federal law.’”) (alteration in original)(quoting *Franchise Tax Bd. V. Constr. Laborers Vacation Trust*, 463 U.S. 1, 9 (1983)).

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<sup>1</sup> Defendants note that they are not required to, nor do they, concede that Plaintiffs are entitled to recover more than \$75,000. *See Kelderman v. Remington Arms Co.*, 734 F.Supp.1527, 1528 (S.D. Iowa 1990) (rejecting a plaintiff’s attempt to “place [a] defendant in the awkward position of embracing a concession on the important issue of damages,” to establish jurisdiction, noting that a “defendant need not go that far”). Indeed, Defendants specifically deny that Plaintiffs are entitled to recover any damages.

1           18. In addition, this Court has original and removal jurisdiction over civil actions, such  
2 as this one, that arise “under the Constitution, laws, or treaties of the United States.” 28 U.S.C §  
3 1331, 1441(a). Among the civil actions that “arise under” federal law are “state-law claims that  
4 implicate significant federal issues.” *Grable* 545 U.S. at 312. Such claims capture the  
5 “commonsense notion that a federal court ought to be able to hear claims recognized under state  
6 law that nonetheless turn on substantial questions of federal law, and thus justify resort to the  
7 experience, solicitude, and hope of uniformity that a federal forum offers on federal issues.” *Id.*

8           19. Thus, federal question jurisdiction also exists where, as here, a “state law claim  
9 necessarily raise[s] a stated federal issue, actually disputed and substantial, which a federal forum  
10 may entertain without disturbing any congressionally approved balance of federal and state judicial  
11 responsibilities.” *Id.* at 314.

12           20. The claims asserted in the Complaint meet both of these standards for federal  
13 question jurisdiction. Although the Complaint is sparse on the actual legal basis of its claims, the  
14 essence of the complaint is that Defendants improperly packaged and distributed propofol.

15           21. The packaging of propofol is regulated by the U.S. Food and Drug Administration  
16 (“FDA”) specifically, 21 Code of Federal Regulation (“CFR”) § 211, which lays out the “minimum  
17 current good manufacturing practice for preparation of drug products . . . for administration to  
18 humans or animals.”

19           22. CFR 211.130 states, “(t)here shall be written procedures designed to assure that  
20 correct labels, labeling, and packaging materials are used for drug products; such written  
21 procedures shall be followed.” “(I)t is a requirement under Current Good Manufacturing Practices  
22 that every drug manufacturer and/or processor develop and follow detailed written procedures for  
23 all aspects of the production, testing, storage, labeling and distribution of any and all of its drug  
24 products.” *U.S. v. Richlyn Laboratories, Inc.*, 822 F.Supp. 268, 272 (E.D. Pa. 1993). In *U.S. v.*  
25 *Richlyn Laboratories, Inc.* the court initially granted a preliminary injunction and later a permanent  
26 injunction enjoining a drug manufacturer from “manufacturing, processing, packaging and  
27 distributing their drug products until such time as they are in full compliance with Current Good  
28 Manufacturing Practices.” *Id.* at 273.

23. Here, the core of the Complaint alleges that the manner in which Defendants' generic propofol was manufactured and/or packaged – processes which are strictly regulated by the FDA – nevertheless violated Nevada State laws. However, the United States Supreme Court has held in *PLIVA, Inc. v. Mensing* and its progeny that the federal government has exclusive authority to regulate the packaging of pharmaceutical drugs, and the Supremacy Clause preempts state laws purporting to place burdens upon drug manufactures that are in conflict with federal regulations. 564 U.S. 604 (2011). Questions concerning the application of FDA regulations to Defendants' propofol, whether Defendants complied with the same, and whether those regulations are in harmony with state law comprise the essence of Plaintiffs' claims. Accordingly, the core of the Complaint "necessarily raise[s] a stated federal issue, actually disputed and substantial" and is therefore removable as it presents a federal question. *Grable*, 545 U.S. at 314.

24. Moreover, Defendants are generic manufacturers of propofol and therefore governed by 21 U.S.C. § 355 and 21 C.F.R. § 314. Specifically, a manufacturer that seeks approval of a generic drug, such as Defendants herein, is responsible for ensuring that its warning label is the same as the brand name's. *Mensing*, 564 U.S. at 613 (citing § 355(j)(2)(A)(v); § 355(j)(4)(G); 21 CFR §§ 314.94(a)(8), 314.127(a)(7)). The requirement that a generic manufacturer keep its label identical to the FDA-approved brand drug's label is referred to as the duty of "sameness." *Mensing*, 564 U.S. at 613, 616. This doctrine applies to every portion of Plaintiffs' complained-of conduct, including the labeling, warnings, route of administration, dosage form, and strength. *See* 21 C.F.R. § 314.94(a)(6); 21 U.S.C. § 355(j)(2)(iii). In each case, Defendants were required by federal law to make their generic propofol identical to the brand name version, subject to certain limited exceptions not alleged by Plaintiffs to be at issue here. This is yet another independent reason why the core of the Complaint "necessarily raise[s] a stated federal issue, actually disputed and substantial" and is therefore removable as it presents a federal question. *Grable*, 545 U.S. at 314.

25. The Complaint also attempts to attack the size of the generic propofol vials sold and distributed by Defendants by inarticulately arguing that Defendants should have simply stopped selling the 50 mL vials. However, the stop-selling theory is extensively discussed and rejected by the U.S. Supreme Court in *Mutual Pharmaceutical Co., Inc. v. Bartlett*, 570 U.S. 472, 488-490

(2013). In *Bartlett*, the Supreme Court attacked the Court of Appeals reasoning that Mutual could “escape the impossibility of complying with both its federal - and state law duties by ‘choos[ing] not to make [sulindac] at all.’” *Id.* at 488 (internal citation omitted). The *Bartlett* Court went on to state, “(t)he incoherence of the stop-selling theory becomes plain when viewed through the lens of our previous cases. In every instance in which the Court has found impossibility pre-emption, the ‘direct conflict’ between federal – and state-law duties could easily have been avoided if the regulated actor had simply ceased acting.” *Id.* The Supreme Court concludes its analysis of the stop selling theory by stating, “(j)ust as the prospect that a regulated actor could avoid liability under both state and federal law by simply leaving the market did not undermine the impossibility analysis in *PLIVA*, so it is irrelevant to our analysis here.” *Id.* at 489-490. Again, this is another independent reason why the core of the Complaint “necessarily raise[s] a stated federal issue, actually disputed and substantial” and is therefore removable as it presents a federal question. *Grable*, 545 U.S. at 314.

26. This Court has “supplemental jurisdiction over all other claims that are so related to the claims in the action within [the Court’s] original jurisdiction that they form part of the same case or controversy under Article III of the United States Constitution.” 28 U.S.C. § 1367(a). As set forth above, Plaintiffs’ claims against Defendants are within the Court’s original jurisdiction pursuant to 28 U.S.C. § 1331. On an individual, per-Plaintiff basis, all other claims in this action arise out of the same case or controversy in that they seek relief in connection with personal injuries allegedly stemming from the use of propofol. Accordingly, there is supplemental jurisdiction over all other claims in this action.

#### **FILING OF SERVICE AND REMOVAL OF DOCUMENTS**

27. A copy of the Complaint is attached hereto as Exhibit “A”.

28. A copy of the Plaintiffs’ Initial Appearance Fee Disclosure is attached hereto as Exhibit “B”.

29. A copy of the Docket Sheet is attached as Exhibit “C”.

30. Other than the documents attached as Exhibits A-C, no pleadings, process, orders, or other documents in the case have been served or otherwise received by Defendants or, to

Defendants' knowledge, are presently on file in the State Court. In the event that such filings come to Defendants' attention, true and legible copies will immediately be filed with this Court.

31. Defendants are serving written notification on Plaintiffs' counsel. Defendants are also filing a Notification of Removal, attaching a copy of this Notice of Removal with the Clerk of the Eighth Judicial District Court, Clark County, State of Nevada.

Based on the foregoing, Defendants remove the above-entitled action now pending in the Eighth Judicial District Court, in and for Clark County, Nevada, as Case No. A-18-781820-C, to this Court.

DATED this 10th day of December, 2018.

HYMANSON & HYMANSON

BY: /s/ Philip M. Hymanson

PHILIP M. HYMANSON, ESQ.

Nevada State Bar No. 2253

HENRY JOSEPH HYMANSON, ESQ.

Nevada State Bar No. 14381

HYMANSON & HYMANSON

8816 Spanish Ridge Avenue

Las Vegas, NV 89148

(702) 629-3300 Telephone

(702) 629-3332 Facsimile

Phil@HymansonLawNV.com

Hank@HymansonLawNV.com

*Attorneys for TEVA PARENTERAL MEDICINES, INC., formerly known as SICOR PHARMACEUTICALS, INC.; SICOR, Inc.; BAXTER HEALTHCARE CORPORATION; McKESSON MEDICAL-SURGICAL INC.*

**CERTIFICATE OF SERVICE**

Pursuant to Fed.R.Civ.P.5(b), and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of Hymanson and Hymanson, and that a true and correct copy of the **NOTICE OF REMOVAL** was served via electronic service, via CM/ECF, on the 10th day of December, 2018, and to the address(es) shown below:

Glen J. Lerner, Esq.  
Nevada Bar No. 4314  
GLEN LERNER INJURY ATTORNEYS  
4795 South Durango Drive  
Las Vegas, Nevada 89147  
Telephone: (702) 877-1500  
Facsimile: (702) 307-5762  
E-mail: glerner@glenlerner.com  
Attorneys for Plaintiffs

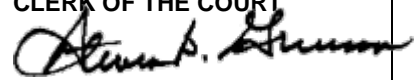
/s/ Karen Wiehl  
an employee of Hymanson & Hymanson

**HYMANSON & HYMANSON**  
8816 Spanish Ridge Avenue  
Las Vegas, NV 89148  
702.629-3300

# EXHIBIT “A”

# EXHIBIT “A”

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Glen J. Lerner, Esq.  
Nevada Bar No. 4314  
GLEN LERNER INJURY ATTORNEYS  
4795 South Durango Drive  
Las Vegas, Nevada 89147  
Telephone: (702) 877-1500  
Facsimile: (702) 307-5762  
E-mail: glerner@glenlerner.com  
Attorneys for Plaintiffs

**DISTRICT COURT****CLARK COUNTY, NEVADA**

ABADJIAN, SOSSY; ACKERMAN, GLORIA; ADARVE, VIRGINIA;  
ADLER, FRANCIS; AGUILAR, CARMEN; AGUILAR, NARCISO  
RENE; ALDER, RHEA; ALLEN, GEORGE; ALLSHOUSE,  
SOCORRO; ALPY, LINDA; ALVAREZ, JOYCE; ANDERSON,  
REBECCA L.; ANDREI, EMANUEL; ANTLES, TERRIE;  
APPLETON-HULTZ, KELLIE; ARCHULETA, ANTHONY;  
ARELLANOS, ESTEBAN; ARIAS, RICKIE; ARKENBURG, MARK;  
ARRIOLA, ROGER; ARTIGA, MARIA; ASBERRY, ROBIN;  
BABCOCK, WINIFRED; BACH, ROBERT; BACHAND, SUSAN F.;  
BAGLEY-TENNER, ELAINE; BAL, MELISSA; BALDRIDGE,  
BRYAN; BARBEE, DOROTHY; BARKER, RONALD; BARNCORD,  
RONALD; BARNES, RUSSELL; BARNHART, PEGGY JO;  
BARRALL, MADALYN; BARTLETT, DONALD; BARTLETT,  
SHERYLE; BAUDOIN, JOSEPH; BAXTER, BARBARA; BEAMON,  
VENUS; BEATTY, BARBARA ROBIN; BEHLINGS, RODNEY;  
BEJARAN, CRISTINA; BENEDETTI, TOMAS; BENFORD, VERA;  
BENKERT, RICHARD; BERGERON, MARSHALL; BERGERON,  
DONNA; BIVONA, SYLVIA; BLAIR, ROBERT; BLAKELEY,  
HARRY; BLANCHARD, DAWN; BLOSS, BONNIE; BOLAR,  
DARRELL; BOLDEN, ROY; BOLDEN, SARAH; BOLEN, SCOT;  
BONILLA, VICTOR; BOONE, JOHN; BORRAYS, GRACIELA;  
BOWEN, BILLY; BOWERS, SHIRLEY; BOWLES, BRIDGET;  
BOYKINS, CATHY; BRADFORD, BRENDA; BRADLEY, SHIRLEY;  
BRAUER, CARLA; BROWN, CAROLYN; BROWN, JACK; BROWN,  
KENNETH; BROWN, LESLIE; BROWN, MICHAEL; BROWN,  
ROBERTA; BRUNS, AMELIA B.; BURCHARD, CARL L.; BURKS,  
TRACI; BURTON, ELIZABETH; BUSTAMANTE- RAMIREZ,  
ANGELITE; BUSTAMANTE, ANASTASIO; BUSTAMANTE,  
MARIO; BUTLER, DOROTHY ANN; CALCATERRA, LEE;  
CALDERON, ROBERT; CALLAHAN, SHEILA; CAMPBELL,  
EVELYN; CAMPOLO, JOHN; CAMPOS, MARIA; CANACARIS,  
BOONYUEN; CANACARIS, CONSTANTINOS; CAPANDA,  
MELISSA; CAPERELL, MARTIN; CARDONA, JAIME; CARDONA,  
PEDRO; CARNEY, SUSIE; CARPENTER, JOHN; CARR, LESTER;  
CARR, TERESA; CARRASCO, BERNARDINO; CARTER, TRUMAN;  
CASTO, XANDRA; CAUDLE, SPENCE; CAUSEY, MARGARET;  
CEBALLOS, XAVIER; CEDENO, ROBERT; CELANO, HELAYNE;  
CELANO, VINCENT; CENTENO, DINORA; CEPEDA,  
GUADALUPE; CHASE, ROY; CHEA, CARIDAD; CHEVEZ, ELSA;  
CHIGER, MARK; CHILDS, LUCILLE; CIRCLE, DONALD; CLARK,  
ALICIA; CLARK, CAROL; CLARK, PATRICIA; COIRO, RICHARD;

CASE NO.: A-18-781820-C

DEPT NO.: Department 4

**COMPLAINT****ARBITRATION EXEMPT**

[Amount in Controversy Exceeds  
\$50,000]

1 COLLINS, PERCELL JR.; COMPTON, ROBERT; CONNER,  
 ERNEST; COOK, CLIFF; COREY, SUSAN; CORREA, PATRICIA;  
 2 COULOMBE, PAUL A.; CRAWFORD, AMBER; CROCKER,  
 RONALD; CROCKETT, PAMELA; CROSS, HOWARD; CROSSLEY,  
 3 ROSSLYN; DANIELS, WILLIAM R.; DAVIS, EVELYN; DAVIS,  
 MARY JEAN; DAVIS, VIRGINIA A.; DAWSON, JESSIE L.;  
 4 DELACRUZ, DENISE M.; DELACRUZ, EMELYN; DERAS, SILVIA;  
 DEROSE, GREGORY; DEVINE, SHERIDA; DIAMOND, CLAIRE;  
 5 DIAZ-PEREZ, JOSE; DIPIETRO, MARK; DIXON, OTIS L.; DOLPIES,  
 EMILIO; DOMINGO, TAMARA; DOMINGUEZ, PAMELA;  
 6 DOMKOSKI, EUQENA; DONATO, JOSEPH; DONIS, HUGO;  
 DONLEY, PATRICIA L.; DRAGANIC, LJUBICA; DUCK, DELORIS  
 7 K.; DUHS, KATHLEEN J.; DUNCAN, LILLIAN; DUSYK, HAROLD;  
 DYER, ALLYSON R. JR.; EASLEY, LOIS; ECHEVERRIA, DEISY;  
 8 EDMOND, DONNEDIA D.; ELAURIA, ROLAND E.; ESCALA,  
 DARIO E.; ESCALA, ENGARCIA B.; ESCALERA, KATHY A.;  
 9 ESCOBEDO, MARIA. ESPINOSA, TERESA I.; ESPOSITO, ERNEST  
 A.; EVANS, LEON; EVANS, WILLIAM; EVERSOLE, JOHN J.;  
 10 FAULKNER, MARY; FEINGOLD, ABRAHAM; FEINGOLD,  
 MURIEL; FENNELL, OSCAR; FERGUSON, MARIETTA;  
 11 FERGUSON, WILLIE; FERRANTE, DANIEL; FICKLIN, CAROLYN;  
 FILBECK, JOE; FINEBERG, ETHEL; FINN, MADELINE C.; FITCH,  
 12 ALBERT L.; FLORES, ADRIAN; FLORES, MARIA; FOLKENFLIK,  
 RONALD; FOREMASTER, RAUNA; FOSTER, JOSEPH E.; FOSTER,  
 13 PHYLLIS G.; FRAZIER, CYNTHIA D.; FREEMAN, VICTORIA;  
 FRIEL, LAWRENCE; FRIESEN, BONITA M.; FRILLARTE, NESS;  
 14 FRISBY, NANCY C.; GAINES, JODI; GALLEGOS, ESPERANZA;  
 GALLEGOS, NEOHMI; GARAY, LUIS; GARCIA, BRENDA;  
 15 GARCIA, MARTHA; GARDNER, SANDRA; GARVEY, MICHAEL;  
 GASS, LOIS; GELLENS, JEREMY; GEOGHEGAN, MARION;  
 16 GEORGE, THERESA; GIANNOPOULOS, TINA; GIANNOPOULOS,  
 ARIS; GILBERT, WANDA; GLENN, GREGORY; GOLDEN, JEAN;  
 17 GOLDEN-LEWIS, TYRA; GOLOB, LUCIANO; GOMEZ; CARRILLO,  
 MARGARITO; GONZALES, PASTOR; GONZALEZ-TORRES,  
 18 JESUS; GORDY, TJ; GOTLIEB, JEFF; GOUDY, ALLEN; GRAHAM,  
 ANNETTA; GRATAN, BILL; GRAY, ARNOLD; GRAY, BONNIE;  
 19 GREEN, DOROTHY; GREEN, TANIA; GREGORICH, ROY;  
 GRESSER, JEFFREY; GRIFFIN, WILLIE; GRIMBLLOT, ROBERT;  
 20 GRIMES, VERNA; GRIMM, CYNTHIA; GRIMM, ROBERT;  
 GRONNA, PATRICK; GUERETTE, CARL; GUEVARA,  
 21 CANDELARIO; GULLI, NICHOLAS; GUTIERREZ, JULIA;  
 HACHEZ, DENISE F.; HADJES, SUE; HAL, ESTHER I.; HALL,  
 22 FRANK J.; HALL, TINA; HAMBLIN, CHARDAI C.; HAMILTON,  
 ROBERT JR.; HANCOCK, DEBORAH; HARO, JESSICA M.;  
 23 HARPER, JOANN; HARRINGTON, ANNA C.; HARRINGTON,  
 MICHAEL S.; HARRIS, DORIS; HARRISON, GLORICE; HARRISON,  
 24 SHARA; HARRISON-CARTER, PATRICIA; HARSHMAN-  
 TALBERT, BRIANNA S.; HARTLEY, RONALD K.; HARWOOD,  
 25 ROBERT; HAUGEN-RATTAZZI, LINDA K.; HAYASHI, ESTHER A.;  
 HAYES, SAMUEL; HEIN, SUSETTE A.; HENDERSON-SHEPHERD,  
 26 NITA; HENNICK, ROY M.; HENSON, JUANITA; HEREDIA, LUCIA;  
 HERNANDEZ, CANDIDO; HERNANDEZ, MARCIAL A.;  
 27 HERNANDEZ, MARIA; HERROLD, THOMAS; HERRON, LUZ;  
 HILL, SUSAN M.; HINER, ISHEKA; HOARD, ARLENE; HOBBS,  
 28 BETH; HOLLIS, MICHELLE; HOLMES, JAQUELINE A.; HOOKER,  
 JOSHUA; HOOVER, WILLIE; HOPPINS, PATRICIA; HORVATH,

1 BELVIA; HORVATH, JAMES; HOSTLER, ANA; HOULE,  
 AUGUSTAVE; HOVIETZ, CARL II; HOWARD, RUTH; HOWELL,  
 2 ROBERT E.; HOWFORD, MICHELE; HUEBNER, EDWARD L.;  
 HUGHES, LOVETTE M.; HUNTER, VIRIGINIA M.; HURTADO-  
 3 MIGUEL, PATRICIA; HWANG, HO NAN; HYYPPA, ANGELA;  
 IBARRA, JANETTE; INFUSO, JOSEPH; INTERDONATI, FRANK;  
 4 IREY, BRIAN; JACKSON, BARRY; JACKSON, CECIL; JACKSON,  
 DORA; JARAMILLO, ROLANDO; JILES, RICHARD; JILES, LETHA;  
 5 JOHNSON, CLIFTON; JOHNSON, DORIS; JOHNSON, EUGENE;  
 JOHNSON, JOHNNY; JOHNSON, JOYCE; JOHNSON, WILLIAM;  
 6 JONES, ARNOLD; KABADAIAN, ANN; KALETA, ANTHONY K.;  
 KAPOOR, ARUN; KEELER, LINDA J.; KEELING, SHARON;  
 7 KELLY, MICHAEL F.; KEYES, RAYANN J.; KIDD , DARRELL;  
 KIM, CONNIE; KIM, SOO-OK; KIM, TAESOOK; KIMBERS,  
 8 SONDR A I.; KINDLER, ELIZABETH I.; KING, IRIS L.; KING,  
 LARRY D.; KOCEJA, RAYMOND E.; KOENEN, TRACEY; KOENIG,  
 9 JOANNA; KOH, PATRICK; KOPANSKI, MICHAEL;  
 KRACHENFELS, MICHAEL J.; KRAMER, CORINNE M.; KROITOR,  
 10 DAVID; KUNIK, OLGA; KUNZIG, KAREN A.; LAFOUNTAIN,  
 ANEITA; LAKE, BARBARA; LAMPMAN, KRYSTAL; LANG,  
 11 DARSEL; LARSON, JONATHAN; LAUREL, BERTHA; LAURON,  
 ANGES G.; LAWSON, MARIE; LEBLANC, PHYLLIS; LEEMAN-  
 12 ROSS, BETTY J.; LETANG, ARLENE; LEV, JANE; LEWIS, JAMES  
 A.; LIEBSCHUTZ, JOAN; LIM, MINERVA L.; LIMES, DEBRA;  
 13 LINDSEY, EDWARD; LINETSKY, SETH; LISTA, EMILIO D.;  
 LITTLE, WILLIAM; LIVINGSTON-STEEL, DOROTHY; LOPEZ,  
 14 FELISA; LOPEZ, IRAIDA; LOPEZ, MARTHA; LOPEZ, NOE; LOPEZ,  
 TONEY E.; LOPRESTO, FRANCINE R.; LUCAS, FLORENCE;  
 15 LUTHER, DARLENE; LYLES, FRANK L.; MACLEAN,  
 STERPHANIE; MADRID, DEBORAH; MAGILL, LORI;  
 16 MAIWAND\*\*, MARWA; MAJOR, DOROTHY J.; MALDONADO,  
 MARGUERITE; MALDONADO, MARIO; MALWITZ, IDA;  
 17 MANUEL, AUDREY; MARES, GABRIEL; MAROHL, ROBERT;  
 MARQUEZ, CAROL A.; MARTIGANI, BRENDA; MARTIN LEE,  
 18 TERRI L.; MARTIN, LEONARD A.; MARTIN, TERRI L.;  
 MARTINEZ, HUGO; MARTINEZ, JORGE B.; MARTINEZ, JOSE;  
 19 MARZULLI, GRACE; MASCARI, MARY LOUISE; MASTRIAN,  
 LUCY; MATTI, FATIN; MAYS, LEROY; MAYS, LISA; MCCALL,  
 20 TERRY; MCCALL, VIRGINIA A.; MCCLAIN, LETTA;  
 MCCLINTON, ALFRED; MCCRAY, STELLA; MCDANIEL,  
 21 LAURENCE; MCDAVID, JOHN JR.; MCDONALD, DAVID;  
 MCDONNELL, DOLORES; MCGEE, DENISE ANNE; MCKINNEY,  
 22 MAE; MCKNIGHT, JANET; MCMILLEN, FRED III; MEACHAM,  
 MYRON; MEJIA, KELLEY; MEKHJIAN, AIDA A.; MELLOR,  
 23 CHELSEY L.; MENDOZA, JIGGERSON; MERRELL-CLAPP,  
 SUSAN; MIDDAGH, JAMES; MILBURN, SYLVIA; MILLER,  
 24 CORINNE; MITCHELL, GERALD; MITCHELL, JANICE;  
 MITCHELL, OLIVER; MIZHIRITSKY, MIKHAIL; MOLITOR, KIRK;  
 25 MOODY, STEVEN; MOORE, MARY; MORA, JOSE; MORALES,  
 YOLANDA; MORALES; CASTRO, ELIZABETH;  
 26 MORCIGLIO, YOLANDA; MORENO, BIVETTA; MORGAN, DAVID;  
 MORGAN, DENISE M.; MORGAN, DOUGLAS; MORGAN, SONIA;  
 27 MORICI, ANDREW; MORRIS, BARRY; MORRIS, JAMES; MORRIS,  
 JUANITA E.; MORSE, MICHELE; MORTENSEN, DAN R.;  
 28 MOSQUEDA, MIGDALIA; MOTOLA, ANDREA; MUNA, ANNIE;  
 MUNGER, JUDITH A.; MUNGUIA, LUCILA; MURANYI, DIANE;

1 MURRAY, WILLIE; MUSCARA, DIOSELINA; NAGY, JOSEPH;  
 NAJARRO, JOSE A.; NAKONECZNY, BONNIE; NANOD, THANG;  
 2 NATINGA, ERLINDA; NAVARRO-ORTIZ, MARIA; NELSON,  
 LEEANNE; NEVINS, DANIEL; NEWELL, LANITA; NOGA, PAUL;  
 3 NORLIN, ROSEMARIE; NOVOTNY, RONALEE; NYDEN,  
 MARSHALL; OBERSHAW, WADE; O'CONNELL, JOSEPH;  
 4 O'FARRIL, LUCIO F.; O'HALLORAN, SHAWN; OKU, ANDREW;  
 OLIVA, DIGNA; O'MARA, JOHN; O'NEAL, NORMA J.; ORCULLO,  
 5 LINDA; OROZCO-GALAN, PAULA; PACHECO, ANGELA;  
 PANKHURST, DENIS; PARATORE, MATT; PARK, ROBERT;  
 6 PARKINSON, KATHY; PAZOS, JESUS; PEARCE, MARILYN;  
 PECCORINI, TERESA; PEDRO, PHYLLIS; PENA, JOSE O.;  
 7 PEOPLES, PATRICIA; PERDOMO, DELMY C.; PEREZ, DORA;  
 PEREZ, LOUISE; PEREZ, LUIS; PEREZ, MARIA; PEREZ,  
 8 MERCEDES; PEREZ-ROQUE, AGUSTIN; PERRET, ANDRE;  
 PERRY, JANET P.; PETERSON, ALAN K.; PHILIP, LOWELL;  
 9 PHILIP, MICHELLE; PICARD, CRAIG; PINSKER, DONALD;  
 PITMAN, JASON B.; PITTMAN, WAYNE; PODROUZEK, JEFF;  
 10 POLILLO, ROGER; POLINSKI, RON; PORTER, JUDY;  
 POURTEYMAUR, MOHAMMED; POWERS, DONNA; POWERS,  
 11 EVA; POWERS, JENNIFER; PRICE, DOUGLAS; PRICE, IVOR;  
 PRIETO, JOSE; PRIETO, LUISA; PRUSSIN, ELY; QUINTERO,  
 12 FRANCISCO; QUIROZ, ANTHONY RAY; RABADAN, MARIBEL;  
 RAGAZZO, MARIO; RAMIREZ , ADRIANA; RAMIREZ, JOHN;  
 13 RAMIREZ, RAUL; RANSOM, EDWARD; RAPOSA, ROBERT;  
 RATTAZZI, DEVIN; REDDING, CANTICE M.; REED, KAREN;  
 14 REYES , HELEN; REYES DE MEDINA, CELIA; REYES, GABRIEL;  
 REYES, MIGUEL; RICE, MICHAEL; ROBERSON, LESTER;  
 15 ROBERTS, BARBARA; ROBINSON, CONSTANCE; ROBINSON,  
 LLOYD H.; ROBY, CONNIE; ROCHESTER, ANTOINETTE;  
 16 RODGERS, VICKI; RODGERS, TREVA; RODRIGUEZ, MARIA;  
 RODRIGUEZ, NENITA; RODRIGUEZ, RICARDO; RODRIGUEZ,  
 17 YOLANDA; RODRIGUEZ-RAMIREZ, JOSE; ROGERS, FREEMAN;  
 ROGGENSEE, CAROLE; ROJAS, SONIA; ROMANO, JOSEPH;  
 18 ROSE, JEAN; RUCKEY, GWENDOLYN; RUSSELL, ROSETTA;  
 SADDLER, DEMETRY; SALAS, JANISANN; SALCEDO, MARIA;  
 19 SALGUERO, FRANCISCO; SANDERS, KERRI; SANDERS, LOVIE;  
 SAUNDERS, PAUL; SAUNDERS, SHERRILYN; SAWYER, DANNY;  
 20 SCHILLING, ISA; SCHLAPPI, SHAUN; SCHROEDER, STEPHEN;  
 SCHULMAN, JEFFREY; SEAY, RAY; SENNESS, SANDRA;  
 21 SERGIO, ANTHONY JR.; SFORZA, MAURICE; SHANKLIN,  
 SYLVIA; SHANKS, JULIE; SHEARER, DOUGLAS; SIMKO,  
 22 SANDRA; SIPPLE, MYRTLE; SKINNER, CHARLES; SLATER,  
 JAMES; SLAUGHTER, JACKLYN; SLAUGHTER, JOHN; SLONE,  
 23 JOHN; SMITH, CATHERINE; SMITH, WILBUR; SNYDER, LILA;  
 SOBIESKI, DOLORES; SOCORRO, MICHELLE; SOMMER,  
 24 WAYNE; SOTO, MARIA; SOUSSANA, VIDANA; SPAINHOUR,  
 JULIE; SPANGLER, JESSICA; SPARKS, PATRICIA; SPARKS,  
 25 SANDRA; SPELLMAN, PATRICIA; STANFORD, JEFFREY;  
 STANKARD, WILLIAM; STANLEY, GINGER; STEWART,  
 26 RODNEY; STOKLOSA, WALTER; STROHECKER, LETICIA;  
 STROMGREN, HAROLD; SUDO, MAFALDA; SWAIN, BARBARA;  
 27 TADEO, NORMA; TARNOWISKI , MIRKA; TARNOWSKI,  
 RYSZARD; TASH, ROXANNE E.; TAYLOR, JILL; THIBEAULT,  
 28 JEANNE; TITUS-PILATE, CATHERINE; TOPPLE, RAYMOND;  
 TORIBIO, DOMINGA; TORRES, YADEL; TOWNSLEY, RITA M.;

1 TRAFTON, ROSELYN; TROMELLO, SALVATORE; TROPP,  
 2 PATRICIA A.; TUCKOSH, DOROTHY; TURNER, LUCY; TURNER,  
 3 TERRY; TUZINSKI, ROBERT; UNRUH, WILLIAM; VALLS, JESUS;  
 4 VALONE, DIANNE; VANCE, GILBERT; VANDERGAAG,  
 5 HILLEGONDA; VELEY, HENRY; VILLEGAS, STELLA; VIRGIL,  
 6 LOUIS; VITAL-CEDENO, CECILIA; VOLK, COLLEEN; VORGIAS,  
 7 CHRIST; WADLOW, WILLIAM; WAGNER, BETTY; WALTERS,  
 8 JOHN; WALTON , JASON; WAMPOLE, JANICE; WARD,  
 9 BARBARA; WARD, GLORIA; WARIS, SANDRA; WATKINS,  
 10 ELIZABETH; WEDDINGTON, LESTER; WEISNER, ARLENE;  
 11 WHEELER, KATHRYN; WHITE, DEBRA; WHITE, FRANK E.;  
 12 WHITE, SERENE; WHITE, SHARON; WILKINS, BRIDGET;  
 13 WILLIAMS, ACE K.; WILLIAMS, ANTHONY; WILLIAMS,  
 14 AUBREY; WILLIAMS, CHARLES; WILLIAMS, CHERYL;  
 15 WILLIAMS, MARY; WILLIAMS, REALINDA; WILLIAMS, WILLIE;  
 16 WILSON, GARY; WILSON, ROBERT; WILT, STEVEN; WINSLOW,  
 17 ANGELA; WINTEROWD, BEVERLY; WINTERS, BETTY; WOLF,  
 18 JAMES; WORTHY, DEREK, individually,

19 Plaintiffs,

20 v.

21 TEVA PARENTERAL MEDICINES, INC., formerly known as SICOR  
 22 PHARMACEUTICALS, INC.; SICOR, Inc., a Delaware Corporation;  
 23 BAXTER HEALTHCARE CORPORATION, a Delaware Corporation;  
 24 McKESSON MEDICAL-SURGICAL INC., a Delaware  
 25 Corporation,

26 Defendants.

## 27 COMPLAINT

28 COME NOW Plaintiffs above-captioned, by and through their attorneys of record, Glen J.  
 Lerner, Esq., of GLEN LERNER INJURY ATTORNEYS, and for their Complaint hereby aver and  
 allege as follows:

1. At all relevant times, Plaintiffs have been adults, competent residents of Clark  
 County, Nevada.

2. Defendant, TEVA PARENTERAL MEDICINES, INC., formerly known as SICOR  
 PHARMACEUTICALS, INC., and SICOR, INC. (hereinafter collectively referred to as "SICOR")  
 are, and were at all relevant times herein, corporations chartered by and existing under and by virtue  
 of the laws of the State of Delaware, with their principal place of business in the State of California  
 and are and were in the business of manufacturing, marketing, distributing, and selling propofol and  
 other medical products utilized by physicians and health care providers in connection with the  
 provision of anesthesia services to patients at the aforementioned Clinics.

1           3. Defendant, BAXTER HEALTHCARE CORPORATION (hereinafter referred to as  
2 "BAXTER") is, and was at all relevant times herein, a corporation chartered by and existing under  
3 and by virtue of the laws of the State of Delaware, with its principal place of business in the State of  
4 Illinois and is and was in the business of manufacturing, marketing, distributing, and selling  
5 propofol and other medical products utilized by physicians and health care providers in connection  
6 with the provision of anesthesia services to patients at the aforementioned Clinics.

7           4. Upon information and belief, Defendant, McKESSON MEDICAL-SURGICAL INC.  
8 (hereinafter referred to as "McKESSON") is, and was at all relevant times herein, a corporation  
9 chartered by and existing under and by virtue of the laws of the State of Delaware, with its principal  
10 place of business in the State of California and is and was in the business of marketing, distributing,  
11 and selling propofol and other medical products utilized by physicians and health care providers in  
12 connection with the provision of anesthesia services to patients at the aforementioned Clinics.

13           5. That at all times mentioned herein, the product Defendants were the agents, servants  
14 and/or employees of each of the other product Defendants, and were acting with permission and  
15 consent and within the course and scope of their agency and employment; that all such Defendants  
16 were responsible in some manner for the events and happenings referred to herein (either directly or  
17 through aiding and abetting, either negligently or intentionally), and proximately caused damages to  
18 Plaintiffs in a way that makes these Defendants jointly and severally liable.

19           6. At all relevant times, Defendants have been parties to and beneficiaries of a tolling  
20 agreement with these Plaintiffs, entered into in this jurisdiction, which has had the effect of tolling  
21 the statute of limitations applicable to Plaintiffs claims.

22           7. Each of the acts alleged herein occurred in Clark County, Nevada, at an endoscopy  
23 center (hereinafter CLINIC) located at 700 Shadow Lane, Clark County, Nevada (or related  
24 facilities) which provided anesthesia services in connection with the provision of endoscopy  
25 procedures to patients.

26           8. At all relevant times (hereinafter understood to be between March 2004 to January  
27 2008), Defendants designed, manufactured labeled, marketed, sold or distributed propofol to the  
28 aforementioned CLINIC.

1           9.       At all relevant times, Defendants knew or should have known of practices and  
2 procedures at the CLINIC which involved the re-use of injection syringes and anesthesia bottles  
3 which created a foreseeable risk of infection/cross-contamination between patients with whom said  
4 syringes and anesthesia bottles were shared.

5           10.      The above-described re-use of injection syringes and anesthesia bottles may not have  
6 occurred each and every time an injection was done at the CLINIC, but happened consistently  
7 enough during the time that Defendants supplied propofol to justify a mass warning of possible  
8 infection sent to all individuals who received an injection at the CLINIC between March 2004 and  
9 January 2008, and said warning did in fact occur commencing in approximately February, 2008.

10          11.      Governmental health officials, health care providers, and representatives of the  
11 CLINIC itself recommended that any and all persons who received an injection at the clinic between  
12 March of 2004 and January of 2008 get tested for Hepatitis B, Hepatitis C, and HIV, as well as  
13 spouses and significant others with whom CLINIC patients may have had sexual contact.

14          12.      At all relevant times, Plaintiffs each received injections at the CLINIC on one or more  
15 occasion, and were thereafter notified or otherwise learned that they were potentially exposed to the  
16 risk of infectious disease by reason of the injection practices and procedures used at the CLINIC.

17          13.      In response to learning that they were potentially exposed to an infectious disease by  
18 reason of the practices and procedures at the CLINIC, Plaintiffs obtained the recommended testing  
19 and eventually learned that they were infection-free.

20          14.      According to the Southern Nevada Health District, [http://www.cchd.org/hepc-](http://www.cchd.org/hepc-investigation/index.php)  
21 [investigation/index.php](http://www.cchd.org/hepc-investigation/index.php), patients of these clinics were exposed to a risk of possible exposure to  
22 blood-borne pathogens in the following manner:

- 23           a.       A syringe (not a needle) that was used to administer medication to a patient was  
24               reused on the same patient to draw up additional medication.
- 25           b.       The process of redrawing medication using the same syringe could have  
26               contaminated the vial from which the medicine was drawn with the blood of the  
27               patient.
- 28           c.       The vial, which was not labeled for use on multiple patients, was then used for a  
             second patient (with a clean needle and syringe).

d. If that vial was contaminated with the blood of the first patient, any subsequent patients given medication from that vial could have been exposed to bloodborne pathogens.

15. On or about February 28, 2008, the Southern Nevada Health District sent Plaintiffs and approximately 60,000 others a letter informing them that they were “placed at risk of possible exposure to bloodborne (sic) pathogens,” and that “[a]s a precaution, and in order to take appropriate steps to protect your health, we recommend you get tested for hepatitis C, hepatitis B, and HIV.”

16. Plaintiffs and many others similarly situated (as either CLINIC patients or persons with whom CLINIC patients had sexual contact) reacted to the Southern Nevada Health District’s notification of possible infection (or notification through some other means) by getting the recommended testing, and incurred medical bills and other out-of-pocket expense for that testing as a result.

17. Plaintiffs (and many others) ultimately tested negative for hepatitis C, hepatitis B, and HIV, but each Plaintiff endured emotional distress, anxiety, and fear during the pendency of their test results and for some time after.

18. Plaintiffs herein have had a tolling agreement in place with Defendants since February 23, 2010.

**FIRST CLAIM FOR RELIEF  
STRICT PRODUCT LIABILITY  
(As to Teva/Sicor, Baxter and McKesson Defendants)**

19. Plaintiffs hereby adopt and incorporate by reference all prior paragraphs as though fully set forth herein.

20. In 1983, the Annals of Internal Medicine published an article entitled "Hepatitis B Virus Transmission Associated With A Multiple-Dose Vial In A Hemodialysis Unit" found at Ann.Intern.Med. 1983; 99; 330-3. Plaintiffs are informed and believe and thereupon allege that the potential for transmission of Hepatitis B or C or HIV from administration of medicine to two or more patients from the same vial has been known since at least 1983.

21. Propofol (i.e., "Diprivan") was initially approved for marketing on October 2, 1989 for use as an anesthetic in outpatient and inpatient procedures.

1           22.     Plaintiffs are informed and believe and thereupon allege that, following the launch of  
2 the original formulation of propofol (i.e., "Diprivan"), that the original manufacturer (i.e., ICI  
3 Pharmaceuticals; which later became Zeneca Pharmaceuticals) and the FDA began to receive reports  
4 of infections associated with the failure of health care providers in the United States to use  
5 appropriate aseptic techniques in the administration of propofol; which reports raised concerns among  
6 Zeneca, the FDA and the Centers for Disease Control and Prevention (the "CDC") about propofol  
7 multi-dosing and its potential contaminant effect.

8           23.     On June 29, 1990, the CDC reported in the MMWR (June 29, 1990/39(25); 426, 247,  
9 433 that 48% to 90% of anesthesia personnel were reusing syringes to administer propofol to multiple  
10 patients:

11           24.     Two recent surveys of anesthesia personnel show that aseptic technique and infection  
12 control practices are frequently not implemented during administration of anesthesia. In these  
13 surveys, from 48% to 90% of respondents reused syringes to multiple patients.

14           25.     Plaintiffs are informed and believe and thereupon allege that, between June 1990 and  
15 February 1993, the CDC conducted investigations at seven hospitals with unusual outbreaks of  
16 infections after surgical procedures using propofol and, focusing on four clusters of post operative  
17 infections in four states, the CDC concluded that contamination occurring from propofol  
18 administration was caused by mishandling the propofol.

19           26.     On July 6, 1990, Nancy E. Nazari of Stuart Pharmaceuticals sent a "Dear Doctor"  
20 letter to health care professionals regarding propofol (i.e., "Diprivan") discussing, among other things,  
21 potential multiple-dose vial contamination.

22           27.     On February 5, 1991, Nancy E. Nazari of Stuart Pharmaceuticals sent a "DearDoctor"  
23 letter to health care professionals regarding propofol (i.e., "Diprivan") discussing, among other things,  
24 potential multiple-dose vial contamination.

25           28.     On July 20, 1995, The New England Journal of Medicine published an article entitled  
26 "Postoperative Infections Traced to Contamination of an Intravenous Anesthetic, Propofol" that  
27 describes the above-referenced CDC investigation and, in addition, provided in pertinent part that  
28

1 anesthesia personnel were in fact reusing multi-dose vials on multiple patients despite written  
2 recommendations to the contrary:

3         29. Despite the written recommendations of professional associations, such as the  
4 American Society of Anesthesiologists and the American Association of Nurse Anesthetists, which  
5 specifically advocate the use of aseptic techniques during the handling of medications, several authors  
6 have reported poor compliance with aseptic techniques and infection-control practices by anesthesia  
7 personnel. Contamination of multi-dose vials, use of a single syringe to administer medication to  
8 different patients, assembling infusion equipment far in advance of use, and contamination of  
9 syringes and catheters have all been implicated in other outbreaks. Studies show that reuse of multi-  
10 dose vials can cause contamination of the medication in the vials and that contamination can occur  
11 during the opening of a glass vial whose surface has not been disinfected. Injecting medications into  
12 intravenous catheters can cause syringes to become contaminated even if the needle is changed, so  
13 that using common syringes to administer medication to different patients can transmit infectious  
14 agents.

15         30. On May 5, 2000, Defendant SICOR (under its then name "GensiaSicor  
16 Pharmaceuticals, Inc.") filed a Suitability Petition with the FDA requesting permission to supplement  
17 an abbreviated new drug application ("ANDA") for "100mg/10mL, single use vial" of propofol and  
18 Defendant SICOR stated that "a smaller vial size is safer in that it may reduce the temptation for  
19 dosing multiple patients from a single container thereby reducing opportunities for microbial  
20 contamination."

21         31. On September 17, 2001, Defendant SICOR (under its then name "GensiaSicor  
22 Pharmaceuticals, Inc.") filed a Suitability Petition with the FDA requesting permission to submit an  
23 abbreviated new drug application ("ANDA") for 2000mg/200mL vials of propofol. On or about  
24 December 17, 2001, the FDA rejected such petition; observing that 20 mL was the propofol "dose  
25 commonly used for propofol induction of anesthesia" and the FDA stated that larger doses "could  
26 make multi-dosing much more tempting and, hence, more likely."  
27  
28

1           32.     Plaintiffs are informed and believe and thereupon allege that, in or about 2002, 12  
2 patients contracted Hepatitis C at a Manhattan physician's endoscopy center caused by medication  
3 drawn through multi-use vials.

4           33.     Plaintiffs are informed and believe and thereupon allege that, in or about 2002, 38  
5 patients contracted Hepatitis C at a Manhattan pain clinic caused by medication drawn through multi-  
6 use vials.

7           34.     In 2003, the World Health Organization reported that single-dose vials should be used  
8 and that "the use of multi-dose vials has been reported to be a potential source of infections in 19  
9 studies." Bulletin of the World Health Organization 2003, 81 (7), entitled "Best infection control  
10 practices for intradermal, subcutaneous, and intramuscular needle injections." One of the 19 studies  
11 referenced involved hepatitis caused by "preparation of multi-dose heparin", which heparin is another  
12 Baxter product. (See Oren, "A common-source outbreak of fulminant Hepatitis B in a hospital."  
13 Annals of Internal Medicine 1989; 110:691-8).

14           35.     In June 2007, the FDA issued an alert that referenced reports of "several clusters of  
15 patients who have developed fever, chills, and body aches shortly after receiving propofol from 7  
16 different facilities in 4 different states," and stated that the same propofol vial was used on multiple  
17 patients: "To date, all affected patients received propofol for sedation in gastrointestinal suites.  
18 Some facilities where the propofol was administered used propofol vials, intended only for single-  
19 patient use, for more than one patient."

20           36.     Plaintiffs are informed and believe and thereupon allege that, because of the hepatitis  
21 outbreaks in New York described above, the New York State Health Commissioner; Dr. Richard  
22 Daines, and the New York City Health Commissioner; Dr. Thomas Frieden, have called for an  
23 outright ban on multi-dose vials.

24           37.     Multiple use of propofol by endoscopy surgery centers on more than one patient was a  
25 foreseeable misuse of propofol vials.

26           38.     Defendants SICOR, BAXTER, and McKESSON knew or should have known that the  
27 smaller vial sizes were safer for endoscopy surgery centers given the amount of propofol typically  
28 used by such centers and the economic allure to such centers to use instead of discarding remaining

1 propofol in a larger vial. As set forth above, Defendant SICOR expressly stated that "a smaller vial  
2 size is safer in that it may reduce the temptation for dosing multiple patients from a single container  
3 thereby reducing opportunities for microbial contamination." (Emphasis added).

4 39. Plaintiffs are informed and believe and thereupon allege that Defendants SICOR,  
5 BAXTER, and McKESSON knew of incidents prior to the shipment of the propofol used in this case  
6 wherein a surgery center reportedly used propofol on more than one patient.

7 40. At the time the propofol was shipped, propofol in larger vial sizes was unreasonably  
8 dangerous for use in an endoscopy surgery center, that is dangerous to any extent beyond that which  
9 would be contemplated by the ordinary and prudent patient using such product, considering the  
10 characteristics of the product (including, but not limited to, the much smaller propofol dosage  
11 normally required for one patient undergoing colonoscopy or endoscopy surgery), its propensities,  
12 risks (including not limited to the potential for transmitting infectious disease such as Hepatitis B or C  
13 or HIV if propofol from the same vial was used on multiple patients), its dangers and uses.

14 41. As a direct and proximate result of the tortious conduct of Defendants SICOR,  
15 BAXTER, and McKESSON alleged herein, Plaintiffs have incurred special damages in the form of  
16 medical expense as well as emotional distress, anxiety, and fear during the pendency of their test  
17 results and for some time after, all to their damage in an amount in excess of Ten Thousand Dollars  
18 (\$10,000.00) and the Fifteen Thousand Dollar (\$15,000.00) minimum necessary to invoke this  
19 Court's jurisdiction.

20 **SECOND CLAIM FOR RELIEF**  
21 **BREACH OF IMPLIED WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE**  
(As to Teva/Sicor, Baxter, McKesson Defendants)

22 42. Plaintiffs hereby adopt and incorporate by reference all prior paragraphs as though  
23 fully set forth herein.

24 43. In March 1999, Defendant Sicor gave Defendant Baxter the exclusive right to market  
25 propofol manufactured by Defendant Sicor in the United States. The agreement between Defendant  
26 Sicor and Defendant Baxter extended through January 1, 2009.



50. At all times mentioned herein, Defendants knew, or in the exercise of reasonable care should have known, that packaging, marketing, and distributing propofol to high turnover ambulatory clinics, such as the Defendant Clinics, in 50 ml vials, was of such a nature that it was likely to encourage or facilitate multi-dosing (use of one vial on multiple patients), which in turn is/was likely to injure the persons to whom it was given.

51. Defendants owed a duty to Plaintiffs to distribute, market, and package the propofol in safe single use vials that are not conducive to multi-dosing.

52. As a result of Defendants negligent packaging, marketing, and distribution, Defendants breached their duty to Plaintiffs by failing to protect Plaintiffs from foreseeable harm, resulting in the subject Clinics use of the vials of propofol on multiple patients and Plaintiffs' corresponding risk of exposure to infectious diseases.

53. As a direct and proximate result of the tortious conduct of Defendants SICOR, BAXTER, and McKESSON alleged herein, Plaintiffs have incurred special damages in the form of medical expense as well as emotional distress, anxiety, and fear during the pendency of their test results and for some time after, all to their damage in an amount in excess of Ten Thousand Dollars (\$10,000.00), and the Fifteen Thousand Dollar (\$15,000.00) minimum necessary to invoke this Court's jurisdiction.

**FOURTH CLAIM FOR RELIEF  
VIOLATION OF NEVADA DECEPTIVE TRADE PRACTICES ACT  
(As to Teva/Sicor, Baxter and McKesson Defendants)**

54. Plaintiffs incorporate by reference each and every preceding paragraph as though fully set forth herein, and further allege:

55. The acts of all Defendants described herein also constitute violations of Nevada's Deceptive Trade Practices Act, as codified in NRS Chapter 598, in that Defendants:

- a. Knowingly made a false representation as to the characteristics, ingredients, uses, benefits, alterations or quantities of goods or services for sale or lease [NRS 598.0915(5)];
- b. Represented that goods or services for sale or lease were of a particular standard, quality or grade, or that such goods were of a particular style or model, where they knew or should have known that they were of another standard, quality, grade, style or model [NRS 598.0915(7)];

1 c. Knowingly made other false representations in a transaction affecting Plaintiffs  
2 Rader and others similarly-situated [NRS 598.0915(15)];

3 d. Failed to disclose a material fact in connection with the sale or lease of goods or  
4 services [NRS 598.0923(2)].

5 56. As a direct and proximate result of the tortious conduct of Defendants SICOR,  
6 BAXTER, and McKESSON alleged herein, Plaintiffs have incurred special damages in the form of  
7 medical expense as well as emotional distress, anxiety, and fear during the pendency of their test  
8 results and for some time after, all to their damage in an amount in excess of Ten Thousand Dollars  
9 (\$10,000.00), and the Fifteen Thousand Dollar (\$15,000.00) minimum necessary to invoke this  
10 Court's jurisdiction.

11 **FIFTH CLAIM FOR RELIEF**  
12 **PUNITIVE DAMAGES**  
13 **(As to Teva/Sicor, Baxter and McKesson Defendants)**

14 57. Plaintiffs incorporate by reference each and every preceding paragraph as though  
15 fully set forth herein.

16 58. The conduct of Defendants TEVA/SICOR, BAXTER, and McKESSON in  
17 manufacturing, distributing, marketing and/or selling propofol in larger vials to endoscopy surgery  
18 centers was willful, reckless, malicious and in total disregard to the health and safety of the patients  
19 or, alternatively, was in conscious and deliberate disregard of known safety procedures, thereby  
20 justifying an award of punitive damages.

21 59. Defendants' acts as described herein constitute oppression, fraud or malice (express or  
22 implied) as those terms are defined in NRS 42.001, warranting the imposition of punitive damages  
23 upon them as permitted under NRS 42.005 and NRS 598.0977, for the sake of example and by way  
24 of punishing the Defendants.

25 60. Plaintiffs herein have had to retain counsel and incur costs by reason of Defendants'  
26 tortious conduct alleged herein.

27 WHEREFORE, Plaintiffs pray for Judgment against the Defendants, and each of them jointly  
28 and severally, as follows:

1. General damages in excess of \$15,000.00 per Plaintiff;
2. Special damages according to proof;

3. Punitive or exemplary damages according to proof;
4. Attorneys' fees;
5. Costs of suit incurred herein; and
6. For such other and further relief as the Court may deem just and proper.

GLEN LERNER INJURY ATTORNEYS

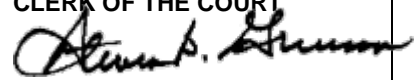
By: /s/ Glen J. Lerner

Glen J. Lerner, Esq.  
Nevada Bar No. 4314  
4795 South Durango Drive  
Las Vegas, NV 89147  
Attorneys for Plaintiffs

# EXHIBIT “B”

# EXHIBIT “B”

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Glen J. Lerner, Esq.  
Nevada Bar No. 4314  
GLEN LERNER INJURY ATTORNEYS  
4795 South Durango Drive  
Las Vegas, Nevada 89147  
Telephone: (702) 877-1500  
Facsimile: (702) 933-7043  
E-mail: glerner@glenlerner.com  
Attorneys for Plaintiff

**DISTRICT COURT****CLARK COUNTY, NEVADA**

ABADJIAN, SOSSY; ACKERMAN, GLORIA; ADARVE, VIRGINIA;  
ADLER, FRANCIS; AGUILAR, CARMEN; AGUILAR, NARCISO  
RENE; ALDER, RHEA; ALLEN, GEORGE; ALLSHOUSE,  
SOCORRO; ALPY, LINDA; ALVAREZ, JOYCE; ANDERSON,  
REBECCA L.; ANDREI, EMANUEL; ANTLES, TERRIE;  
APPLETON-HULTZ, KELLIE; ARCHULETA, ANTHONY;  
ARELLANOS, ESTEBAN; ARIAS, RICKIE; ARKENBURG, MARK;  
ARRIOLA, ROGER; ARTIGA, MARIA; ASBERRY, ROBIN;  
BABCOCK, WINIFRED; BACH, ROBERT; BACHAND, SUSAN F.;  
BAGLEY-TENNER, ELAINE; BAL, MELISSA; BALDRIDGE,  
BRYAN; BARBEE, DOROTHY; BARKER, RONALD; BARNCORD,  
RONALD; BARNES, RUSSELL; BARNHART, PEGGY JO;  
BARRALL, MADALYN; BARTLETT, DONALD; BARTLETT,  
SHERYLE; BAUDOIN, JOSEPH; BAXTER, BARBARA; BEAMON,  
VENUS; BEATTY, BARBARA ROBIN; BEHLINGS, RODNEY;  
BEJARAN, CRISTINA; BENEDETTI, TOMAS; BENFORD, VERA;  
BENKERT, RICHARD; BERGERON, MARSHALL; BERGERON,  
DONNA; BIVONA, SYLVIA; BLAIR, ROBERT; BLAKELEY,  
HARRY; BLANCHARD, DAWN; BLOSS, BONNIE; BOLAR,  
DARRELL; BOLDEN, ROY; BOLDEN, SARAH; BOLEN, SCOT;  
BONILLA, VICTOR; BOONE, JOHN; BORRAYS, GRACIELA;  
BOWEN, BILLY; BOWERS, SHIRLEY; BOWLES, BRIDGET;  
BOYKINS, CATHY; BRADFORD, BRENDA; BRADLEY, SHIRLEY;  
BRAUER, CARLA; BROWN, CAROLYN; BROWN, JACK; BROWN,  
KENNETH; BROWN, LESLIE; BROWN, MICHAEL; BROWN,  
ROBERTA; BRUNS, AMELIA B.; BURCHARD, CARL L.; BURKS,  
TRACI; BURTON, ELIZABETH; BUSTAMANTE- RAMIREZ,  
ANGELITE; BUSTAMANTE, ANASTASIO; BUSTAMANTE,  
MARIO; BUTLER, DOROTHY ANN; CALCATERRA, LEE;  
CALDERON, ROBERT; CALLAHAN, SHEILA; CAMPBELL,  
EVELYN; CAMPOLO, JOHN; CAMPOS, MARIA; CANACARIS,  
BOONYUEN; CANACARIS, CONSTANTINOS; CAPANDA,  
MELISSA; CAPERELL, MARTIN; CARDONA, JAIME; CARDONA,  
PEDRO; CARNEY, SUSIE; CARPENTER, JOHN; CARR, LESTER;  
CARR, TERESA; CARRASCO, BERNARDINO; CARTER, TRUMAN;  
CASTO, XANDRA; CAUDLE, SPENCE; CAUSEY, MARGARET;  
CEBALLOS, XAVIER; CEDENO, ROBERT; CELANO, HELAYNE;  
CELANO, VINCENT; CENTENO, DINORA; CEPEDA,  
GUADALUPE; CHASE, ROY; CHEA, CARIDAD; CHEVEZ, ELSA;  
CHIGER, MARK; CHILDS, LUCILLE; CIRCLE, DONALD; CLARK,  
ALICIA; CLARK, CAROL; CLARK, PATRICIA; COIRO, RICHARD;

CASE NO.: A-18-781820-C

DEPT NO.: Department 4

**INITIAL APPEARANCE FEE  
DISCLOSURE**

1 COLLINS, PERCELL JR.; COMPTON, ROBERT; CONNER,  
 ERNEST; COOK, CLIFF; COREY, SUSAN; CORREA, PATRICIA;  
 2 COULOMBE, PAUL A.; CRAWFORD, AMBER; CROCKER,  
 RONALD; CROCKETT, PAMELA; CROSS, HOWARD; CROSSLEY,  
 3 ROSSLYN; DANIELS, WILLIAM R.; DAVIS, EVELYN; DAVIS,  
 MARY JEAN; DAVIS, VIRGINIA A.; DAWSON, JESSIE L.;  
 4 DELACRUZ, DENISE M.; DELACRUZ, EMELYN; DERAS, SILVIA;  
 DEROSE, GREGORY; DEVINE, SHERIDA; DIAMOND, CLAIRE;  
 5 DIAZ-PEREZ, JOSE; DIPIETRO, MARK; DIXON, OTIS L.; DOLPIES,  
 EMILIO; DOMINGO, TAMARA; DOMINGUEZ, PAMELA;  
 6 DOMKOSKI, EUQENA; DONATO, JOSEPH; DONIS, HUGO;  
 DONLEY, PATRICIA L.; DRAGANIC, LJUBICA; DUCK, DELORIS  
 7 K.; DUHS, KATHLEEN J.; DUNCAN, LILLIAN; DUSYK, HAROLD;  
 DYER, ALLYSON R. JR.; EASLEY, LOIS; ECHEVERRIA, DEISY;  
 8 EDMOND, DONNEDIA D.; ELAURIA, ROLAND E.; ESCALA,  
 DARIO E.; ESCALA, ENGARCIA B.; ESCALERA, KATHY A.;  
 9 ESCOBEDO, MARIA. ESPINOSA, TERESA I.; ESPOSITO, ERNEST  
 A.; EVANS, LEON; EVANS, WILLIAM; EVERSOLE, JOHN J.;  
 10 FAULKNER, MARY; FEINGOLD, ABRAHAM; FEINGOLD,  
 MURIEL; FENNELL, OSCAR; FERGUSON, MARIETTA;  
 11 FERGUSON, WILLIE; FERRANTE, DANIEL; FICKLIN, CAROLYN;  
 FILBECK, JOE; FINEBERG, ETHEL; FINN, MADELINE C.; FITCH,  
 12 ALBERT L.; FLORES, ADRIAN; FLORES, MARIA; FOLKENFLIK,  
 RONALD; FOREMASTER, RAUNA; FOSTER, JOSEPH E.; FOSTER,  
 13 PHYLLIS G.; FRAZIER, CYNTHIA D.; FREEMAN, VICTORIA;  
 FRIEL, LAWRENCE; FRIESEN, BONITA M.; FRILLARTE, NESS;  
 14 FRISBY, NANCY C.; GAINES, JODI; GALLEGOS, ESPERANZA;  
 GALLEGOS, NEOHMI; GARAY, LUIS; GARCIA, BRENDA;  
 15 GARCIA, MARTHA; GARDNER, SANDRA; GARVEY, MICHAEL;  
 GASS, LOIS; GELLENS, JEREMY; GEOGHEGAN, MARION;  
 16 GEORGE, THERESA; GIANNOPOULOS, TINA; GIANNOPOULOS,  
 ARIS; GILBERT, WANDA; GLENN, GREGORY; GOLDEN, JEAN;  
 17 GOLDEN-LEWIS, TYRA; GOLOB, LUCIANO; GOMEZ; CARRILLO,  
 MARGARITO; GONZALES, PASTOR; GONZALEZ-TORRES,  
 18 JESUS; GORDY, TJ; GOTLIEB, JEFF; GOUDY, ALLEN; GRAHAM,  
 ANNETTA; GRATTAN, BILL; GRAY, ARNOLD; GRAY, BONNIE;  
 19 GREEN, DOROTHY; GREEN, TANIA; GREGORICH, ROY;  
 GRESSER, JEFFREY; GRIFFIN, WILLIE; GRIMBLLOT, ROBERT;  
 20 GRIMES, VERNA; GRIMM, CYNTHIA; GRIMM, ROBERT;  
 GRONNA, PATRICK; GUERETTE, CARL; GUEVARA,  
 21 CANDELARIO; GULLI, NICHOLAS; GUTIERREZ, JULIA;  
 HACHEZ, DENISE F.; HADJES, SUE; HAL, ESTHER I.; HALL,  
 22 FRANK J.; HALL, TINA; HAMBLIN, CHARDAI C.; HAMILTON,  
 ROBERT JR.; HANCOCK, DEBORAH; HARO, JESSICA M.;  
 23 HARPER, JOANN; HARRINGTON, ANNA C.; HARRINGTON,  
 MICHAEL S.; HARRIS, DORIS; HARRISON, GLORICE; HARRISON,  
 24 SHARA; HARRISON-CARTER, PATRICIA; HARSHMAN-  
 TALBERT, BRIANNA S.; HARTLEY, RONALD K.; HARWOOD,  
 25 ROBERT; HAUGEN-RATTAZZI, LINDA K.; HAYASHI, ESTHER A.;  
 HAYES, SAMUEL; HEIN, SUSETTE A.; HENDERSON-SHEPHERD,  
 26 NITA; HENNICK, ROY M.; HENSON, JUANITA; HEREDIA, LUCIA;  
 HERNANDEZ, CANDIDO; HERNANDEZ, MARCIAL A.;  
 27 HERNANDEZ, MARIA; HERROLD, THOMAS; HERRON, LUZ;  
 HILL, SUSAN M.; HINER, ISHEKA; HOARD, ARLENE; HOBBS,  
 28 BETH; HOLLIS, MICHELLE; HOLMES, JAQUELINE A.; HOOKER,  
 JOSHUA; HOOVER, WILLIE; HOPPINS, PATRICIA; HORVATH,

1 BELVIA; HORVATH, JAMES; HOSTLER, ANA; HOULE,  
 AUGUSTAVE; HOVIETZ, CARL II; HOWARD, RUTH; HOWELL,  
 2 ROBERT E.; HOWFORD, MICHELE; HUEBNER, EDWARD L.;  
 HUGHES, LOVETTE M.; HUNTER, VIRIGINIA M.; HURTADO-  
 3 MIGUEL, PATRICIA; HWANG, HO NAN; HYYPPA, ANGELA;  
 IBARRA, JANETTE; INFUSO, JOSEPH; INTERDONATI, FRANK;  
 4 IREY, BRIAN; JACKSON, BARRY; JACKSON, CECIL; JACKSON,  
 DORA; JARAMILLO, ROLANDO; JILES, RICHARD; JILES, LETHA;  
 5 JOHNSON, CLIFTON; JOHNSON, DORIS; JOHNSON, EUGENE;  
 JOHNSON, JOHNNY; JOHNSON, JOYCE; JOHNSON, WILLIAM;  
 6 JONES, ARNOLD; KABADAIAN, ANN; KALETA, ANTHONY K.;  
 KAPOOR, ARUN; KEELER, LINDA J.; KEELING, SHARON;  
 7 KELLY, MICHAEL F.; KEYES, RAYANN J.; KIDD , DARRELL;  
 KIM, CONNIE; KIM, SOO-OK; KIM, TAESOOK; KIMBERS,  
 8 SONDR A I.; KINDLER, ELIZABETH I.; KING, IRIS L.; KING,  
 LARRY D.; KOCEJA, RAYMOND E.; KOENEN, TRACEY; KOENIG,  
 9 JOANNA; KOH, PATRICK; KOPANSKI, MICHAEL;  
 KRACHENFELS, MICHAEL J.; KRAMER, CORINNE M.; KROITOR,  
 10 DAVID; KUNIK, OLGA; KUNZIG, KAREN A.; LAFOUNTAIN,  
 ANEITA; LAKE, BARBARA; LAMPMAN, KRYSTAL; LANG,  
 11 DARSEL; LARSON, JONATHAN; LAUREL, BERTHA; LAURON,  
 ANGES G.; LAWSON, MARIE; LEBLANC, PHYLLIS; LEEMAN-  
 12 ROSS, BETTY J.; LETANG, ARLENE; LEV, JANE; LEWIS, JAMES  
 A.; LIEBSCHUTZ, JOAN; LIM, MINERVA L.; LIMES, DEBRA;  
 13 LINDSEY, EDWARD; LINETSKY, SETH; LISTA, EMILIO D.;  
 LITTLE, WILLIAM; LIVINGSTON-STEEL, DOROTHY; LOPEZ,  
 14 FELISA; LOPEZ, IRAIDA; LOPEZ, MARTHA; LOPEZ, NOE; LOPEZ,  
 TONEY E.; LOPRESTO, FRANCINE R.; LUCAS, FLORENCE;  
 15 LUTHER, DARLENE; LYLES, FRANK L.; MACLEAN,  
 STERPHANIE; MADRID, DEBORAH; MAGILL, LORI;  
 16 MAIWAND\*\*, MARWA; MAJOR, DOROTHY J.; MALDONADO,  
 MARGUERITE; MALDONADO, MARIO; MALWITZ, IDA;  
 17 MANUEL, AUDREY; MARES, GABRIEL; MAROHL, ROBERT;  
 MARQUEZ, CAROL A.; MARTIGANI, BRENDA; MARTIN LEE,  
 18 TERRI L.; MARTIN, LEONARD A.; MARTIN, TERRI L.;  
 MARTINEZ, HUGO; MARTINEZ, JORGE B.; MARTINEZ, JOSE;  
 19 MARZULLI, GRACE; MASCARI, MARY LOUISE; MASTRIAN,  
 LUCY; MATTI, FATIN; MAYS, LEROY; MAYS, LISA; MCCALL,  
 20 TERRY; MCCALL, VIRGINIA A.; MCCLAIN, LETTA;  
 MCCLINTON, ALFRED; MCCRAY, STELLA; MCDANIEL,  
 21 LAURENCE; MCDAVID, JOHN JR.; MCDONALD, DAVID;  
 MCDONNELL, DOLORES; MCGEE, DENISE ANNE; MCKINNEY,  
 22 MAE; MCKNIGHT, JANET; MCMILLEN, FRED III; MEACHAM,  
 MYRON; MEJIA, KELLEY; MEKHJIAN, AIDA A.; MELLOR,  
 23 CHELSEY L.; MENDOZA, JIGGERSON; MERRELL-CLAPP,  
 SUSAN; MIDDAGH, JAMES; MILBURN, SYLVIA; MILLER,  
 24 CORINNE; MITCHELL, GERALD; MITCHELL, JANICE;  
 MITCHELL, OLIVER; MIZHIRITSKY, MIKHAIL; MOLITOR, KIRK;  
 25 MOODY, STEVEN; MOORE, MARY; MORA, JOSE; MORALES,  
 YOLANDA; MORALES; CASTRO, ELIZABETH;  
 26 MORCIGLIO, YOLANDA; MORENO, BIVETTA; MORGAN, DAVID;  
 MORGAN, DENISE M.; MORGAN, DOUGLAS; MORGAN, SONIA;  
 27 MORICI, ANDREW; MORRIS, BARRY; MORRIS, JAMES; MORRIS,  
 JUANITA E.; MORSE, MICHELE; MORTENSEN, DAN R.;  
 28 MOSQUEDA, MIGDALIA; MOTOLA, ANDREA; MUNA, ANNIE;  
 MUNGER, JUDITH A.; MUNGUIA, LUCILA; MURANYI, DIANE;

1 MURRAY, WILLIE; MUSCARA, DIOSELINA; NAGY, JOSEPH;  
 NAJARRO, JOSE A.; NAKONECZNY, BONNIE; NANOD, THANG;  
 2 NATINGA, ERLINDA; NAVARRO-ORTIZ, MARIA; NELSON,  
 LEEANNE; NEVINS, DANIEL; NEWELL, LANITA; NOGA, PAUL;  
 3 NORLIN, ROSEMARIE; NOVOTNY, RONALEE; NYDEN,  
 MARSHALL; OBERSHAW, WADE; O'CONNELL, JOSEPH;  
 4 O'FARRIL, LUCIO F.; O'HALLORAN, SHAWN; OKU, ANDREW;  
 OLIVA, DIGNA; O'MARA, JOHN; O'NEAL, NORMA J.; ORCULLO,  
 5 LINDA; OROZCO-GALAN, PAULA; PACHECO, ANGELA;  
 PANKHURST, DENIS; PARATORE, MATT; PARK, ROBERT;  
 6 PARKINSON, KATHY; PAZOS, JESUS; PEARCE, MARILYN;  
 PECCORINI, TERESA; PEDRO, PHYLLIS; PENA, JOSE O.;  
 7 PEOPLES, PATRICIA; PERDOMO, DELMY C.; PEREZ, DORA;  
 PEREZ, LOUISE; PEREZ, LUIS; PEREZ, MARIA; PEREZ,  
 8 MERCEDES; PEREZ-ROQUE, AGUSTIN; PERRET, ANDRE;  
 PERRY, JANET P.; PETERSON, ALAN K.; PHILIP, LOWELL;  
 9 PHILIP, MICHELLE; PICARD, CRAIG; PINSKER, DONALD;  
 PITMAN, JASON B.; PITTMAN, WAYNE; PODROUZEK, JEFF;  
 10 POLILLO, ROGER; POLINSKI, RON; PORTER, JUDY;  
 POURTEYMAUR, MOHAMMED; POWERS, DONNA; POWERS,  
 11 EVA; POWERS, JENNIFER; PRICE, DOUGLAS; PRICE, IVOR;  
 PRIETO, JOSE; PRIETO, LUISA; PRUSSIN, ELY; QUINTERO,  
 12 FRANCISCO; QUIROZ, ANTHONY RAY; RABADAN, MARIBEL;  
 RAGAZZO, MARIO; RAMIREZ , ADRIANA; RAMIREZ, JOHN;  
 13 RAMIREZ, RAUL; RANSOM, EDWARD; RAPOSA, ROBERT;  
 RATTAZZI, DEVIN; REDDING, CANTICE M.; REED, KAREN;  
 14 REYES , HELEN; REYES DE MEDINA, CELIA; REYES, GABRIEL;  
 REYES, MIGUEL; RICE, MICHAEL; ROBERSON, LESTER;  
 15 ROBERTS, BARBARA; ROBINSON, CONSTANCE; ROBINSON,  
 LLOYD H.; ROBY, CONNIE; ROCHESTER, ANTOINETTE;  
 16 RODGERS, VICKI; RODGERS, TREVA; RODRIGUEZ, MARIA;  
 RODRIGUEZ, NENITA; RODRIGUEZ, RICARDO; RODRIGUEZ,  
 17 YOLANDA; RODRIGUEZ-RAMIREZ, JOSE; ROGERS, FREEMAN;  
 ROGGENSEE, CAROLE; ROJAS, SONIA; ROMANO, JOSEPH;  
 18 ROSE, JEAN; RUCKEY, GWENDOLYN; RUSSELL, ROSETTA;  
 SADDLER, DEMETRY; SALAS, JANISANN; SALCEDO, MARIA;  
 19 SALGUERO, FRANCISCO; SANDERS, KERRI; SANDERS, LOVIE;  
 SAUNDERS, PAUL; SAUNDERS, SHERRILYN; SAWYER, DANNY;  
 20 SCHILLING, ISA; SCHLAPPI, SHAUN; SCHROEDER, STEPHEN;  
 SCHULMAN, JEFFREY; SEAY, RAY; SENNESS, SANDRA;  
 21 SERGIO, ANTHONY JR.; SFORZA, MAURICE; SHANKLIN,  
 SYLVIA; SHANKS, JULIE; SHEARER, DOUGLAS; SIMKO,  
 22 SANDRA; SIPPLE, MYRTLE; SKINNER, CHARLES; SLATER,  
 JAMES; SLAUGHTER, JACKLYN; SLAUGHTER, JOHN; SLONE,  
 23 JOHN; SMITH, CATHERINE; SMITH, WILBUR; SNYDER, LILA;  
 SOBIESKI, DOLORES; SOCORRO, MICHELLE; SOMMER,  
 24 WAYNE; SOTO, MARIA; SOUSSANA, VIDANA; SPAINHOUR,  
 JULIE; SPANGLER, JESSICA; SPARKS, PATRICIA; SPARKS,  
 25 SANDRA; SPELLMAN, PATRICIA; STANFORD, JEFFREY;  
 STANKARD, WILLIAM; STANLEY, GINGER; STEWART,  
 26 RODNEY; STOKLOSA, WALTER; STROHECKER, LETICIA;  
 STROMGREN, HAROLD; SUDO, MAFALDA; SWAIN, BARBARA;  
 27 TADEO, NORMA; TARNOWISKI , MIRKA; TARNOWSKI,  
 RYSZARD; TASH, ROXANNE E.; TAYLOR, JILL; THIBEAULT,  
 28 JEANNE; TITUS-PILATE, CATHERINE; TOPPLE, RAYMOND;  
 TORIBIO, DOMINGA; TORRES, YADEL; TOWNSLEY, RITA M.;

1 TRAFTON, ROSELYN; TROMELLO, SALVATORE; TROPP,  
 2 PATRICIA A.; TUCKOSH, DOROTHY; TURNER, LUCY; TURNER,  
 3 TERRY; TUZINSKI, ROBERT; UNRUH, WILLIAM; VALLS, JESUS;  
 4 VALONE, DIANNE; VANCE, GILBERT; VANDERGAAG,  
 5 HILLEGONDA; VELEY, HENRY; VILLEGAS, STELLA; VIRGIL,  
 6 LOUIS; VITAL-CEDENO, CECILIA; VOLK, COLLEEN; VORGIAS,  
 7 CHRIST; WADLOW, WILLIAM; WAGNER, BETTY; WALTERS,  
 8 JOHN; WALTON , JASON; WAMPOLE, JANICE; WARD,  
 9 BARBARA; WARD, GLORIA; WARIS, SANDRA; WATKINS,  
 10 ELIZABETH; WEDDINGTON, LESTER; WEISNER, ARLENE;  
 11 WHEELER, KATHRYN; WHITE, DEBRA; WHITE, FRANK E.;  
 12 WHITE, SERENE; WHITE, SHARON; WILKINS, BRIDGET;  
 13 WILLIAMS, ACE K.; WILLIAMS, ANTHONY; WILLIAMS,  
 14 AUBREY; WILLIAMS, CHARLES; WILLIAMS, CHERYL;  
 15 WILLIAMS, MARY; WILLIAMS, REALINDA; WILLIAMS, WILLIE;  
 16 WILSON, GARY; WILSON, ROBERT; WILT, STEVEN; WINSLOW,  
 17 ANGELA; WINTEROWD, BEVERLY; WINTERS, BETTY; WOLF,  
 18 JAMES; WORTHY, DEREK, individually,

19  
 20 Plaintiffs,

21 v.

22 TEVA PARENTERAL MEDICINES, INC., formerly known as SICOR  
 23 PHARMACEUTICALS, INC.; SICOR, Inc., a Delaware Corporation;  
 24 BAXTER HEALTHCARE CORPORATION, a Delaware Corporation;  
 25 McKESSON MEDICAL-SURGICAL INC., a Delaware  
 26 Corporation,

27 Defendants.

28  
 29 **INITIAL APPEARANCE FEE DISCLOSURE**  
 30 **(NRS CHAPTER 19)**

31 Pursuant to NRS Chapter 19, as amended by Senate Bill 106, filing fees are submitted for  
 32 parties appearing in the above entitled action as indicated below:

33	ABADJIAN, SOSSY	\$270.00
34	ACKERMAN, GLORIA	\$ 30.00
35	ADARVE, VIRGINIA	\$ 30.00
36	ADLER, FRANCIS	\$ 30.00
37	AGUILAR, CARMEN	\$ 30.00
38	AGUILAR, NARCISO RENE	\$ 30.00
39	ALDER, RHEA	\$ 30.00
40	ALLEN, GEORGE	\$ 30.00
41	ALLSHOUSE, SOCORRO	\$ 30.00
42	ALPY, LINDA	\$ 30.00
43	ALVAREZ, JOYCE	\$ 30.00
44	ANDERSON, REBECCA L.	\$ 30.00
45	ANDREI, EMANUEL	\$ 30.00
46	ANTLES, TERRIE	\$ 30.00

1	APPLETON-HULTZ, KELLIE	\$ 30.00
2	ARCHULETA, ANTHONY	\$ 30.00
3	ARELLANOS, ESTEBAN	\$ 30.00
4	ARIAS, RICKIE	\$ 30.00
5	ARKENBURG, MARK	\$ 30.00
6	ARRIOLA, ROGER	\$ 30.00
7	ARTIGA, MARIA	\$ 30.00
8	ASBERRY, ROBIN	\$ 30.00
9	BABCOCK, WINIFRED	\$ 30.00
10	BACH, ROBERT	\$ 30.00
11	BACHAND, SUSAN F.	\$ 30.00
12	BAGLEY-TENNER, ELAINE	\$ 30.00
13	BAL, MELISSA	\$ 30.00
14	BALDRIDGE, BRYAN	\$ 30.00
15	BARBEE, DOROTHY	\$ 30.00
16	BARKER, RONALD	\$ 30.00
17	BARNCORD, RONALD	\$ 30.00
18	BARNES, RUSSELL	\$ 30.00
19	BARNHART, PEGGY JO	\$ 30.00
20	BARRALL, MADALYN	\$ 30.00
21	BARTLETT, DONALD	\$ 30.00
22	BARTLETT, SHERYLE	\$ 30.00
23	BAUDOIN, JOSEPH	\$ 30.00
24	BAXTER, BARBARA	\$ 30.00
25	BEAMON, VENUS	\$ 30.00
26	BEATTY, BARBARA ROBIN	\$ 30.00
27	BEHLINGS, RODNEY	\$ 30.00
28	BEJARAN, CRISTINA	\$ 30.00
	BENEDETTI, TOMAS	\$ 30.00
	BENFORD, VERNA	\$ 30.00
	BENKERT, RICHARD	\$ 30.00
	BERGERON, MARSHALL	\$ 30.00
	BERGERON, DONNA	\$ 30.00
	BIVONA, SYLVIA	\$ 30.00
	BLAIR, ROBERT	\$ 30.00
	BLAKELEY, HARRY	\$ 30.00
	BLANCHARD, DAWN	\$ 30.00
	BLOSS, BONNIE	\$ 30.00
	BOLAR, DARRELL	\$ 30.00
	BOLDEN, ROY	\$ 30.00
	BOLDEN, SARAH	\$ 30.00
	BOLEN, SCOT	\$ 30.00
	BONILLA, VICTOR	\$ 30.00
	BOONE, JOHN	\$ 30.00
	BORRAYES, GRACIELA	\$ 30.00
	BOWEN, BILLY	\$ 30.00
	BOWERS, SHIRLEY	\$ 30.00
	BOWLES, BRIDGET	\$ 30.00

1	BOYKINS, CATHY	\$ 30.00
	BRADFORD, BRENDA	\$ 30.00
2	BRADLEY, SHIRLEY	\$ 30.00
	BRAUER, CARLA	\$ 30.00
3	BROWN, CAROLYN	\$ 30.00
	BROWN, JACK	\$ 30.00
4	BROWN, KENNETH	\$ 30.00
	BROWN, LESLIE	\$ 30.00
5	BROWN, MICHAEL	\$ 30.00
	BROWN, ROBERTA	\$ 30.00
6	BRUNS, AMELIA B.	\$ 30.00
	BURCHARD, CARL L.	\$ 30.00
7	BURKS, TRACI	\$ 30.00
	BURTON, ELIZABETH	\$ 30.00
8	BUSTAMANTE- RAMIREZ, ANGELITE	\$ 30.00
	BUSTAMANTE, ANASTASIO	\$ 30.00
9	BUSTAMANTE, MARIO	\$ 30.00
10	BUTLER, DOROTHY ANN	\$ 30.00
	CALCATERRA, LEE	\$ 30.00
11	CALDERON, ROBERT	\$ 30.00
	CALLAHAN, SHEILA	\$ 30.00
12	CAMPBELL, EVELYN	\$ 30.00
	CAMPOLO, JOHN	\$ 30.00
13	CAMPOS, MARIA	\$ 30.00
	CANACARIS, BOONYUEN	\$ 30.00
14	CANACARIS, CONSTANTINOS	\$ 30.00
	CAPANDA, MELISSA	\$ 30.00
15	CAPERELL, MARTIN	\$ 30.00
	CARDONA, JAIME	\$ 30.00
16	CARDONA, PEDRO	\$ 30.00
	CARNEY, SUSIE	\$ 30.00
17	CARPENTER, JOHN	\$ 30.00
	CARR, LESTER	\$ 30.00
18	CARR, TERESA	\$ 30.00
	CARRASCO, BERNARDINO	\$ 30.00
19	CARTER, TRUMAN	\$ 30.00
	CASTO, XANDRA	\$ 30.00
20	CAUDLE, SPENCE	\$ 30.00
	CAUSEY, MARGARET	\$ 30.00
21	CEBALLOS, XAVIER	\$ 30.00
	CEDENO, ROBERT	\$ 30.00
22	CELANO, HELAYNE	\$ 30.00
	CELANO, VINCENT	\$ 30.00
23	CENTENO, DINORA	\$ 30.00
	CEPEDA, GUADALUPE	\$ 30.00
24	CHASE, ROY	\$ 30.00
	CHEA, CARIDAD	\$ 30.00
25	CHEVEZ, ELSA	\$ 30.00
26		
27		
28		

1	CHIGER, MARK	\$ 30.00
	CHILDS, LUCILLE	\$ 30.00
2	CIRCLE, DONALD	\$ 30.00
	CLARK, ALICIA	\$ 30.00
3	CLARK, CAROL	\$ 30.00
	CLARK, PATRICIA	\$ 30.00
4	COIRO, RICHARD	\$ 30.00
	COLLINS, PERCELL JR.	\$ 30.00
5	COMPTON, ROBERT	\$ 30.00
	CONNER, ERNEST	\$ 30.00
6	COOK, CLIFF	\$ 30.00
	COREY, SUSAN	\$ 30.00
7	CORREA, PATRICIA	\$ 30.00
	COULOMBE, PAUL A.	\$ 30.00
8	CRAWFORD, AMBER	\$ 30.00
	CROCKER, RONALD	\$ 30.00
9	CROCKETT, PAMELA	\$ 30.00
10	CROSS, HOWARD	\$ 30.00
	CROSSLEY, ROSSLYN	\$ 30.00
11	DANIELS, WILLIAM R.	\$ 30.00
	DAVIS, EVELYN	\$ 30.00
12	DAVIS, MARY JEAN	\$ 30.00
	DAVIS, VIRGINIA A.	\$ 30.00
13	DAWSON, JESSIE L.	\$ 30.00
	DELACRUZ, DENISE M	\$ 30.00
14	DELACRUZ, EMELYN	\$ 30.00
	DERAS, SILVIA	\$ 30.00
15	DEROSE, GREGORY	\$ 30.00
	DEVINE, SHERIDA	\$ 30.00
16	DIAMOND, CLAIRE	\$ 30.00
	DIAZ-PEREZ, JOSE	\$ 30.00
17	DIPIETRO, MARK	\$ 30.00
	DIXON, OTIS L.	\$ 30.00
18	DOLPIES, EMILIO	\$ 30.00
	DOMINGO, TAMARA	\$ 30.00
19	DOMINGUEZ, PAMELA	\$ 30.00
	DOMKOSKI, EUQENA	\$ 30.00
20	DONATO, JOSEPH	\$ 30.00
	DONIS, HUGO	\$ 30.00
21	DONLEY, PATRICIA L.	\$ 30.00
	DRAGANIC, LJUBICA	\$ 30.00
22	DUCK, DELORIS K.	\$ 30.00
	DUHS, KATHLEEN J.	\$ 30.00
23	DUNCAN, LILLIAN	\$ 30.00
	DUSYK, HAROLD	\$ 30.00
24	DYER, ALLYSON R. JR.	\$ 30.00
	EASLEY, LOIS	\$ 30.00
25	ECHEVERRIA, DEISY	\$ 30.00
26		
27		
28		

1	EDMOND, DONNEDIA D.	\$ 30.00
	ELAURIA, ROLAND E.	\$ 30.00
2	ESCALA, DARIO E.	\$ 30.00
	ESCALA, ENGARCIA B.	\$ 30.00
3	ESCALERA, KATHY A.	\$ 30.00
	ESCOBEDO, MARIA	\$ 30.00
4	ESPINOSA, TERESA I.	\$ 30.00
	ESPOSITO, ERNEST A.	\$ 30.00
5	EVANS, LEON	\$ 30.00
6	EVANS, WILLIAM	\$ 30.00
	EVERSOLE, JOHN J.	\$ 30.00
7	FAULKNER, MARY	\$ 30.00
	FEINGOLD, ABRAHAM	\$ 30.00
8	FEINGOLD, MURIEL	\$ 30.00
	FENNELL, OSCAR	\$ 30.00
9	FERGUSON, MARIETTA	\$ 30.00
10	FERGUSON, WILLIE	\$ 30.00
	FERRANTE, DANIEL	\$ 30.00
11	FICKLIN, CAROLYN	\$ 30.00
	FILBECK, JOE	\$ 30.00
12	FINEBERG, ETHEL	\$ 30.00
	FINN, MADELINE C.	\$ 30.00
13	FITCH, ALBERT L	\$ 30.00
14	FLORES, ADRIAN	\$ 30.00
	FLORES, MARIA	\$ 30.00
15	FOLKENFLIK, RONALD	\$ 30.00
	FOREMASTER, RAUNA	\$ 30.00
16	FOSTER, JOSEPH E	\$ 30.00
	FOSTER, PHYLLIS G.	\$ 30.00
17	FRAZIER, CYNTHIA D.	\$ 30.00
18	FREEMAN, VICTORIA	\$ 30.00
	FRIEL, LAWRENCE	\$ 30.00
19	FRIESEN, BONITA M.	\$ 30.00
	FRILLARTE, NESS	\$ 30.00
20	FRISBY, NANCY C.	\$ 30.00
	GAINES, JODI	\$ 30.00
21	GALLEGOS, ESPERANZA	\$ 30.00
22	GALLEGOS, NEOHMI	\$ 30.00
	GARAY, LUIS	\$ 30.00
23	GARCIA, BRENDA	\$ 30.00
	GARCIA, MARTHA	\$ 30.00
24	GARDNER, SANDRA	\$ 30.00
	GARVEY, MICHAEL	\$ 30.00
25	GASS, LOIS	\$ 30.00
26	GELLENS, JEREMY	\$ 30.00
	GEOGHEGAN, MARION	\$ 30.00
27	GEORGE, THERESA	\$ 30.00
28	GIANNOPOULOS, TINA	\$ 30.00

1	GIANNOPOULOS, ARIS	\$ 30.00
2	GILBERT, WANDA	\$ 30.00
3	GLENN, GREGORY	\$ 30.00
4	GOLDEN, JEAN	\$ 30.00
5	GOLDEN-LEWIS, TYRA	\$ 30.00
6	GOLOB, LUCIANO	\$ 30.00
7	GOMEZ-CARRILLO, MARGARITO	\$ 30.00
8	GONZALES, PASTOR	\$ 30.00
9	GONZALEZ-TORRES, JESUS	\$ 30.00
10	GORDY, TJ	\$ 30.00
11	GOTLIEB, JEFF	\$ 30.00
12	GOUDY, ALLEN	\$ 30.00
13	GRAHAM, ANNETTA	\$ 30.00
14	GRATTAN, BILL	\$ 30.00
15	GRAY, ARNOLD	\$ 30.00
16	GRAY, BONNIE	\$ 30.00
17	GREEN, DOROTHY	\$ 30.00
18	GREEN, TANIA	\$ 30.00
19	GREGORICH, ROY	\$ 30.00
20	GRESSER, JEFFREY	\$ 30.00
21	GRIFFIN, WILLIE	\$ 30.00
22	GRIMBLT, ROBERT	\$ 30.00
23	GRIMES, VERNA	\$ 30.00
24	GRIMM, CYNTHIA	\$ 30.00
25	GRIMM, ROBERT	\$ 30.00
26	GRONNA, PATRICK	\$ 30.00
27	GUERETTE, CARL	\$ 30.00
28	GUEVARA, CANDELARIO	\$ 30.00
	GULLI, NICHOLAS	\$ 30.00
	GUTIERREZ, JULIA	\$ 30.00
	HACHEZ, DENISE F	\$ 30.00
	HADJES, SUE	\$ 30.00
	HAL, ESTHER I	\$ 30.00
	HALL, FRANK J	\$ 30.00
	HALL, TINA	\$ 30.00
	HAMBLIN, CHARDAI C.	\$ 30.00
	HAMILTON, ROBERT JR.	\$ 30.00
	HANCOCK, DEBORAH	\$ 30.00
	HARO, JESSICA M.	\$ 30.00
	HARPER, JOANN	\$ 30.00
	HARRINGTON, ANNA C.	\$ 30.00
	HARRINGTON, MICHAEL S.	\$ 30.00
	HARRIS, DORIS	\$ 30.00
	HARRISON, GLORICE	\$ 30.00
	HARRISON, SHARA	\$ 30.00
	HARRISON-CARTER, PATRICIA	\$ 30.00
	HARSHMAN-TALBERT, BRIANNA S.	\$ 30.00
	HARTLEY, RONALD K	\$ 30.00

1	HARWOOD, ROBERT	\$ 30.00
	HAUGEN-RATTAZZI, LINDA K	\$ 30.00
2	HAYASHI, ESTHER A	\$ 30.00
	HAYES, SAMUEL	\$ 30.00
3	HEIN, SUSETTE A	\$ 30.00
	HENDERSON-SHEPHERD, NITA	\$ 30.00
4	HENNICK, ROY M	\$ 30.00
	HENSON, JUANITA	\$ 30.00
5	HEREDIA, LUCIA	\$ 30.00
	HERNANDEZ, CANDIDO	\$ 30.00
6	HERNANDEZ, MARCIAL A.	\$ 30.00
	HERNANDEZ, MARIA	\$ 30.00
7	HERROLD, THOMAS	\$ 30.00
	HERRON, LUZ	\$ 30.00
8	HILL, SUSAN M.	\$ 30.00
	HINER, ISHEKA	\$ 30.00
9	HOARD, ARLENE	\$ 30.00
10	HOBBS, BETH	\$ 30.00
	HOLLIS, MICHELLE	\$ 30.00
11	HOLMES, JAQUELINE A	\$ 30.00
	HOOKER, JOSHUA	\$ 30.00
12	HOOVER, WILLIE	\$ 30.00
	HOPPINS, PATRICIA	\$ 30.00
13	HORVATH, BELVIA	\$ 30.00
	HORVATH, JAMES	\$ 30.00
14	HOSTLER, ANA	\$ 30.00
	HOULE, AUGUSTAVE	\$ 30.00
15	HOVIETZ, CARL II	\$ 30.00
	HOWARD, RUTH	\$ 30.00
16	HOWELL, ROBERT E	\$ 30.00
	HOWFORD, MICHELE	\$ 30.00
17	HUEBNER, EDWARD L.	\$ 30.00
	HUGHES, LOVETTE M	\$ 30.00
18	HUNTER, VIRIGINIA M	\$ 30.00
	HURTADO-MIGUEL, PATRICIA	\$ 30.00
19	HWANG, HO NAN	\$ 30.00
	HYPPA, ANGELA	\$ 30.00
20	IBARRA, JANETTE	\$ 30.00
	INFUSO, JOSEPH	\$ 30.00
21	INTERDONATI, FRANK	\$ 30.00
	IREY, BRIAN	\$ 30.00
22	JACKSON, BARRY	\$ 30.00
	JACKSON, CECIL	\$ 30.00
23	JACKSON, DORA	\$ 30.00
	JARAMILLO, ROLANDO	\$ 30.00
24	JILES, RICHARD	\$ 30.00
	JILES, LETHA	\$ 30.00
25	JOHNSON, CLIFTON	\$ 30.00
26		
27		
28		

1	JOHNSON, DORIS	\$ 30.00
	JOHNSON, EUGENE	\$ 30.00
2	JOHNSON, JOHNNY	\$ 30.00
	JOHNSON, JOYCE	\$ 30.00
3	JOHNSON, WILLIAM	\$ 30.00
	JONES, ARNOLD	\$ 30.00
4	KABADAIAN, ANN	\$ 30.00
	KALETA, ANTHONY K.	\$ 30.00
5	KAPOOR, ARUN	\$ 30.00
	KEELER, LINDA J.	\$ 30.00
6	KEELING, SHARON	\$ 30.00
	KELLY, MICHAEL F.	\$ 30.00
7	KEYES, RAYANN J	\$ 30.00
	KIDD, DARRELL	\$ 30.00
8	KIM, CONNIE	\$ 30.00
	KIM, SOO-OK	\$ 30.00
9	KIM, TAESOOK	\$ 30.00
10	KIMBERS, SONDR A I.	\$ 30.00
	KINDLER, ELIZABETH I	\$ 30.00
11	KING, IRIS L	\$ 30.00
	KING, LARRY D.	\$ 30.00
12	KOCEJA, RAYMOND E	\$ 30.00
	KOENEN, TRACEY	\$ 30.00
13	KOENIG, JOANNA	\$ 30.00
	KOH, PATRICK	\$ 30.00
14	KOPANSKI, MICHAEL	\$ 30.00
	KRACHENFELS, MICHAEL J.	\$ 30.00
15	KRAMER, CORINNE M.	\$ 30.00
	KROITOR, DAVID	\$ 30.00
16	KUNIK, OLGA	\$ 30.00
	KUNZIG, KAREN A.	\$ 30.00
17	LAFOUNTAIN, ANEITA	\$ 30.00
	LAKE, BARBARA	\$ 30.00
18	LAMPMAN, KRYSTAL	\$ 30.00
	LANG, DARSEL	\$ 30.00
19	LARSON, JONATHAN	\$ 30.00
	LAUREL, BERTHA	\$ 30.00
20	LAURON, ANGES G.	\$ 30.00
	LAWSON, MARIE	\$ 30.00
21	LEBLANC, PHYLLIS	\$ 30.00
	LEEMAN-ROSS, BETTY J.	\$ 30.00
22	LETANG, ARLENE	\$ 30.00
	LEV, JANE	\$ 30.00
23	LEWIS, JAMES A.	\$ 30.00
	LIEBSCHUTZ, JOAN	\$ 30.00
24	LIM, MINERVA L.	\$ 30.00
	LIMES, DEBRA	\$ 30.00
25	LINDSEY, EDWARD	\$ 30.00

1	LINETSKY, SETH	\$ 30.00
	LISTA, EMILIO D.	\$ 30.00
2	LITTLE, WILLIAM	\$ 30.00
	LIVINGSTON-STEEL, DOROTHY	\$ 30.00
3	LOPEZ, FELISA	\$ 30.00
	LOPEZ, IRAIDA	\$ 30.00
4	LOPEZ, MARTHA	\$ 30.00
	LOPEZ, NOE	\$ 30.00
5	LOPEZ, TONEY E.	\$ 30.00
	LOPRESTO, FRANCINE R.	\$ 30.00
6	LUCAS, FLORENCE	\$ 30.00
	LUTHER, DARLENE	\$ 30.00
7	LYLES, FRANK L.	\$ 30.00
	MACLEAN, STERPHANIE	\$ 30.00
8	MADRID, DEBORAH	\$ 30.00
	MAGILL, LORI	\$ 30.00
9	MAIWAND**, MARWA	\$ 30.00
	MAJOR, DOROTHY J.	\$ 30.00
10	MALDONADO, MARGUERITE	\$ 30.00
	MALDONADO, MARIO	\$ 30.00
11	MALWITZ, IDA	\$ 30.00
	MANUEL, AUDREY	\$ 30.00
12	MARES, GABRIEL	\$ 30.00
	MAROHL, ROBERT	\$ 30.00
13	MARQUEZ, CAROL A.	\$ 30.00
	MARTIGANI, BRENDA	\$ 30.00
14	MARTIN LEE, TERRI L.	\$ 30.00
	MARTIN, LEONARD A.	\$ 30.00
15	MARTIN, TERRI L.	\$ 30.00
	MARTINEZ, HUGO	\$ 30.00
16	MARTINEZ, JORGE B.	\$ 30.00
	MARTINEZ, JOSE	\$ 30.00
17	MARZULLI, GRACE	\$ 30.00
	MASCARI, MARY LOUISE	\$ 30.00
18	MASTRIAN, LUCY	\$ 30.00
	MATTI, FATIN	\$ 30.00
19	MAYS, LEROY	\$ 30.00
	MAYS, LISA	\$ 30.00
20	MCCALL, TERRY	\$ 30.00
	MCCALL, VIRGINIA A.	\$ 30.00
21	MCCLAIN, LETTA	\$ 30.00
	MCCLINTON, ALFRED	\$ 30.00
22	MCCRAY, STELLA	\$ 30.00
	MCDANIEL, LAURENCE	\$ 30.00
23	MCDONALD, DAVID	\$ 30.00
	MCDONNELL, DOLORES	\$ 30.00
24	MCDAVID, JOHN JR.	\$ 30.00
	MCGEES, DENISE ANNE	\$ 30.00
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1	MCKINNEY, MAE	\$ 30.00
	MCKNIGHT, JANET	\$ 30.00
2	MCMILLEN, FRED III	\$ 30.00
	MEACHAM, MYRON	\$ 30.00
3	MEJIA, KELLEY	\$ 30.00
	MEKHJIAN, AIDA A.	\$ 30.00
4	MELLOR, CHELSEY L	\$ 30.00
	MENDOZA, JIGGERSON	\$ 30.00
5	MERRELL-CLAPP, SUSAN	\$ 30.00
	MIDDAUGH, JAMES	\$ 30.00
6	MILBURN, SYLVIA	\$ 30.00
	MILLER, CORINNE	\$ 30.00
7	MITCHELL, GERALD	\$ 30.00
	MITCHELL, JANICE	\$ 30.00
8	MITCHELL, OLIVER	\$ 30.00
	MIZHIRITSKY, MIKHAIL	\$ 30.00
9	MOLITOR, KIRK	\$ 30.00
10	MOODY, STEVEN	\$ 30.00
	MOORE, MARY	\$ 30.00
11	MORA, JOSE	\$ 30.00
	MORALES, YOLANDA	\$ 30.00
12	MORALES-CASTRO, ELIZABETH	\$ 30.00
	MORCIGLIO, YOLANDA	\$ 30.00
13	MORENO, BIVETTA	\$ 30.00
	MORGAN, DAVID	\$ 30.00
14	MORGAN, DENISE M	\$ 30.00
	MORGAN, DOUGLAS	\$ 30.00
15	MORGAN, SONIA	\$ 30.00
	MORICI, ANDREW	\$ 30.00
16	MORRIS, BARRY	\$ 30.00
	MORRIS, JAMES	\$ 30.00
17	MORRIS, JUANITA E.	\$ 30.00
	MORSE, MICHELE	\$ 30.00
18	MORTENSEN, DAN R	\$ 30.00
	MOSQUEDA, MIGDALIA	\$ 30.00
19	MOTOLA, ANDREA	\$ 30.00
	MUNA, ANNIE	\$ 30.00
20	MUNGER, JUDITH A.	\$ 30.00
	MUNGUIA, LUCILA	\$ 30.00
21	MURANYI, DIANE	\$ 30.00
	MURRAY, WILLIE	\$ 30.00
22	MUSCARA, DIOSELINA	\$ 30.00
	NAGY, JOSEPH	\$ 30.00
23	NAJARRO, JOSE A.	\$ 30.00
	NAKONECZNY, BONNIE	\$ 30.00
24	NANOD, THANG	\$ 30.00
	NATINGA, ERLINDA	\$ 30.00
25	NAVARRO-ORTIZ, MARIA	\$ 30.00
26		
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1	NELSON, LEEANNE	\$ 30.00
	NEVINS, DANIEL	\$ 30.00
2	NEWELL, LANITA	\$ 30.00
	NOGA, PAUL	\$ 30.00
3	NORLIN, ROSEMARIE	\$ 30.00
	NOVOTNY, RONALEE	\$ 30.00
4	NYDEN, MARSHALL	\$ 30.00
	OBERSHAW, WADE	\$ 30.00
5	O'CONNELL, JOSEPH	\$ 30.00
	O'FARRIL, LUCIO F.	\$ 30.00
6	O'HALLORAN, SHAWN	\$ 30.00
	OKU, ANDREW	\$ 30.00
7	OLIVA, DIGNA	\$ 30.00
	O'MARA, JOHN	\$ 30.00
8	O'NEAL, NORMA J.	\$ 30.00
	ORCULLO, LINDA	\$ 30.00
9	OROZCO-GALAN, PAULA	\$ 30.00
10	PACHECO, ANGELA	\$ 30.00
	PANKHURST, DENIS	\$ 30.00
11	PARATORE, MATT	\$ 30.00
	PARK, ROBERT	\$ 30.00
12	PARKINSON, KATHY	\$ 30.00
	PAZOS, JESUS	\$ 30.00
13	PEARCE, MARILYN	\$ 30.00
	PECCORINI, TERESA	\$ 30.00
14	PEDRO, PHYLLIS	\$ 30.00
	PENA, JOSE O.	\$ 30.00
15	PEOPLES, PATRICIA	\$ 30.00
	PERDOMO, DELMY C.	\$ 30.00
16	PEREZ, DORA	\$ 30.00
	PEREZ, LOUISE	\$ 30.00
17	PEREZ, LUIS	\$ 30.00
	PEREZ, MARIA	\$ 30.00
18	PEREZ, MERCEDES	\$ 30.00
	PEREZ-ROQUE, AGUSTIN	\$ 30.00
19	PERRET, ANDRE	\$ 30.00
	PERRY, JANET P.	\$ 30.00
20	PETERSON, ALAN K	\$ 30.00
	PHILIP, LOWELL	\$ 30.00
21	PHILIP, MICHELLE	\$ 30.00
	PICARD, CRAIG	\$ 30.00
22	PINSKER, DONALD	\$ 30.00
	PITMAN, JASON B.	\$ 30.00
23	PITTMAN, WAYNE	\$ 30.00
	PODROUZEK, JEFF	\$ 30.00
24	POLILLO, ROGER	\$ 30.00
	POLINSKI, RON	\$ 30.00
25	PORTER, JUDY	\$ 30.00
26		
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1	POURTEYMAUR, MOHAMMED	\$ 30.00
	POWERS, DONNA	\$ 30.00
2	POWERS, EVA	\$ 30.00
	POWERS, JENNIFER	\$ 30.00
3	PRICE, DOUGLAS	\$ 30.00
	PRICE, IVOR	\$ 30.00
4	PRIETO, JOSE	\$ 30.00
	PRIETO, LUISA	\$ 30.00
5	PRUSSIN, ELY	\$ 30.00
	QUINTERO, FRANCISCO	\$ 30.00
6	QUIROZ, ANTHONY RAY	\$ 30.00
	RABADAN, MARIBEL	\$ 30.00
7	RAGAZZO, MARIO	\$ 30.00
	RAMIREZ, ADRIANA	\$ 30.00
8	RAMIREZ, JOHN	\$ 30.00
	RAMIREZ, RAUL	\$ 30.00
9	RANSOM, EDWARD	\$ 30.00
10	RAPOSA, ROBERT	\$ 30.00
	RATTAZZI, DEVIN	\$ 30.00
11	REDDING, CANTICE M.	\$ 30.00
	REED, KAREN	\$ 30.00
12	REYES, HELEN	\$ 30.00
	REYES DE MEDINA, CELIA	\$ 30.00
13	REYES, GABRIEL	\$ 30.00
	REYES, MIGUEL	\$ 30.00
14	RICE, MICHAEL	\$ 30.00
	ROBERSON, LESTER	\$ 30.00
15	ROBERTS, BARBARA	\$ 30.00
	ROBINSON, CONSTANCE	\$ 30.00
16	ROBINSON, LLOYD H.	\$ 30.00
	ROBY, CONNIE	\$ 30.00
17	ROCHESTER, ANTOINETTE	\$ 30.00
	RODGER, VICKI	\$ 30.00
18	RODGERS, TREVA	\$ 30.00
	RODRIGUEZ, MARIA	\$ 30.00
19	RODRIGUEZ, NENITA	\$ 30.00
	RODRIGUEZ, RICARDO	\$ 30.00
20	RODRIGUEZ, YOLANDA	\$ 30.00
	RODRIGUEZ-RAMIREZ, JOSE	\$ 30.00
21	ROGERS, FREEMAN	\$ 30.00
	ROGGENSEE, CAROLE	\$ 30.00
22	ROJAS, SONIA	\$ 30.00
	ROMANO, JOSEPH	\$ 30.00
23	ROSE, JEAN	\$ 30.00
	RUCKEY, GWENDOLYN	\$ 30.00
24	RUSSELL, ROSETTA	\$ 30.00
	SADDLER, DEMETRY	\$ 30.00
25	SALAS, JANISANN	\$ 30.00
26		
27		
28		

1	SALCEDO, MARIA	\$ 30.00
	SALGUERO, FRANCISCO	\$ 30.00
2	SANDERS, KERRI	\$ 30.00
	SANDERS, LOVIE	\$ 30.00
3	SAUNDERS, PAUL	\$ 30.00
	SAUNDERS, SHERRILYN	\$ 30.00
4	SAWYER, DANNY	\$ 30.00
	SCHILLING, ISA	\$ 30.00
5	SCHLAPPI, SHAUN	\$ 30.00
	SCHROEDER, STEPHEN	\$ 30.00
6	SCHULMAN, JEFFREY	\$ 30.00
	SEAY, RAY	\$ 30.00
7	SENNES, SANDRA	\$ 30.00
	SERGIO, ANTHONY JR.	\$ 30.00
8	SFORZA, MAURICE	\$ 30.00
	SHANKLIN, SYLVIA	\$ 30.00
9	SHANKS, JULIE	\$ 30.00
10	SHEARER, DOUGLAS	\$ 30.00
	SIMKO, SANDRA	\$ 30.00
11	SIPPLE, MYRTLE	\$ 30.00
	SKINNER, CHARLES	\$ 30.00
12	SLATER, JAMES	\$ 30.00
	SLAUGHTER, JACKLYN	\$ 30.00
13	SLAUGHTER, JOHN	\$ 30.00
	SLONE, JOHN	\$ 30.00
14	SMITH, CATHERINE	\$ 30.00
	SMITH, WILBUR	\$ 30.00
15	SNYDER, LILA	\$ 30.00
	SOBIESKI, DOLORES	\$ 30.00
16	SOCORRO, MICHELLE	\$ 30.00
	SOMMER, WAYNE	\$ 30.00
17	SOTO, MARIA	\$ 30.00
	SOUSSANA, VIDANA	\$ 30.00
18	SPAINHOUR, JULIE	\$ 30.00
	SPANGLER, JESSICA	\$ 30.00
19	SPARKS, PATRICIA	\$ 30.00
	SPARKS, SANDRA	\$ 30.00
20	SPELLMAN, PATRICIA	\$ 30.00
	STANFORD, JEFFREY	\$ 30.00
21	STANKARD, WILLIAM	\$ 30.00
	STANLEY, GINGER	\$ 30.00
22	STEWART, RODNEY	\$ 30.00
	STOKLOSA, WALTER	\$ 30.00
23	STROHECKER, LETICIA	\$ 30.00
	STROMGREN, HAROLD	\$ 30.00
24	SUDO, MAFALDA	\$ 30.00
	SWAIN, BARBARA	\$ 30.00
25	TADEO, NORMA	\$ 30.00
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27		
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1	TARNOWISKI, MIRKA	\$ 30.00
	TARNOWSKI, RYSZARD	\$ 30.00
2	TASH, ROXANNE E.	\$ 30.00
3	TAYLOR, JILL	\$ 30.00
	THIBEAULT, JEANNE	\$ 30.00
4	TITUS-PILATE, CATHERINE	\$ 30.00
	TOPPLE, RAYMOND	\$ 30.00
5	TORIBIO, DOMINGA	\$ 30.00
	TORRES, YADEL	\$ 30.00
6	TOWNSLEY, RITA M.	\$ 30.00
7	TRAFTON, ROSELYN	\$ 30.00
	TROMELLO, SALVATORE	\$ 30.00
8	TROP, PATRICIA A.	\$ 30.00
	TUCKOSH, DOROTHY	\$ 30.00
9	TURNER, LUCY	\$ 30.00
	TURNER, TERRY	\$ 30.00
10	TUZINSKI, ROBERT	\$ 30.00
11	UNRUH, WILLIAM	\$ 30.00
	VALLS, JESUS	\$ 30.00
12	VALONE, DIANNE	\$ 30.00
	VANCE, GILBERT	\$ 30.00
13	VANDERGAAG, HILLEGONDA	\$ 30.00
	VELEY, HENRY	\$ 30.00
14	VILLEGAS, STELLA	\$ 30.00
15	VIRGIL, LOUIS	\$ 30.00
	VITAL-CEDENO, CECILIA	\$ 30.00
16	VOLK, COLLEEN	\$ 30.00
	VORGAS, CHRIST	\$ 30.00
17	WADLOW, WILLIAM	\$ 30.00
	WAGNER, BETTY	\$ 30.00
18	WALTERS, JOHN	\$ 30.00
19	WALTON, JASON	\$ 30.00
	WAMPOLE, JANICE	\$ 30.00
20	WARD, BARBARA	\$ 30.00
	WARD, GLORIA	\$ 30.00
21	WARIS, SANDRA	\$ 30.00
	WATKINS, ELIZABETH	\$ 30.00
22	WEDDINGTON, LESTER	\$ 30.00
23	WEISNER, ARLENE	\$ 30.00
	WHEELER, KATHRYN	\$ 30.00
24	WHITE, DEBRA	\$ 30.00
	WHITE, FRANK E.	\$ 30.00
25	WHITE, SERENE	\$ 30.00
	WHITE, SHARON	\$ 30.00
26	WILKINS, BRIDGET	\$ 30.00
27	WILLIAMS, ACE K.	\$ 30.00
	WILLIAMS, ANTHONY	\$ 30.00
28	WILLIAMS, AUBREY	\$ 30.00

1	WILLIAMS, CHARLES	\$ 30.00
2	WILLIAMS, CHERYL	\$ 30.00
3	WILLIAMS, MARY	\$ 30.00
4	WILLIAMS, REALINDA	\$ 30.00
5	WILLIAMS, WILLIE	\$ 30.00
6	WILSON, GARY	\$ 30.00
7	WILSON, ROBERT	\$ 30.00
8	WILT, STEVEN	\$ 30.00
9	WINSLOW, ANGELA	\$ 30.00
10	WINTEROWD, BEVERLY	\$ 30.00
11	WINTERS, BETTY	\$ 30.00
12	WOLF, JAMES	\$ 30.00
13	WORTHY, DEREK	\$ 30.00

14 **TOTAL REMITTED:** **\$19,800.00**

15 GLEN LERNER INJURY ATTORNEYS

16 By: /s/ Glen J. Lerner

17 Glen J. Lerner, Esq.

18 Nevada Bar No.

19 4795 South Durango Drive

20 Las Vegas, NV 89147

21 Attorneys for Plaintiff

# EXHIBIT “C”

# EXHIBIT “C”

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## REGISTER OF ACTIONS

CASE NO. A-18-781820-C

Sossy Abadjian, Plaintiff(s) vs. Teva Parenteral Medicines Inc, Defendant  
(s)

§  
§  
§  
§  
§  
§

Case Type: **Product Liability**

Date Filed: **09/27/2018**

Location: **Department 4**

Cross-Reference Case Number: **A781820**

### RELATED CASE INFORMATION

#### Related Cases

A-18-781820-C-P1 (Large Case - Subcase)

A-18-781820-C-P2 (Large Case - Subcase)

A-18-781820-C-P3 (Large Case - Subcase)

### PARTY INFORMATION

		Lead Attorneys
Defendant	Baxter Healthcare Corporation	
Defendant	McKesson Medical-Surgical Inc	
Defendant	Sicor Inc	
Defendant	Teva Parenteral Medicines Inc	
Plaintiff	All Plaintiffs A781820 Abadjian, Sossy Ackerman, Gloria Adarve, Virginia Adler, Francis Adler, Rhea Aguilar, Carmen Aguilar, Narcisco Rene Allen, George Allshouse, Socorro Alpy, Linda Alvarez, Joyce Anderson, Rebecca L Andrei, Emanuel Antles, Terrie Appleton- Hultz, Kellie Archuleta, Anthony Arellanos, Esteban Arias, Rickie Arkenburg, Mark Arriola, Roger Artiga, Maria Asberry, Robin Babcock, Winifred Bach, Robert Bachand, Susan F Bagley-Tenner, Elaine Bal, Melissa Baldrige, Brian Barbee, Dorothy Barker, Ronald Barncord, Ronald Barnes, Russell Barnhart, Peggy Jo Barrall, Madalyn Bartlett, Donald Bartlett, Sheryle Baudoin, Joseph Baxter, Barbara Beamon, Venus Beatty, Barbara Robin Behlings, Rodney Bejaran, Cristina Benedetti, Thomas Benford, Verna Benkert, Richard Bergeron, Donna Bergeron, Marshall Bivona, Sylvia Blair, Robert Blakeley, Harry Blanchard, Dawn Bloss, Bonnie Bolar, Darrell Bolden, Roy Bolden, Sarah Bolen, Scot Bonilla, Victor Boone, John Borrayes, Graciela Bowen, Billy Bowers, Shirley Bowles, Bridget Boykins, Cathy Bradford, Brenda Bradley, Shirley Brauer, Carla Brown, Carolyn Brown, Jack Brown, Kenneth Brown, Leslie Brown, Michael Brown, Roberta Bruns, Amelia B Burchard, Carl L Burks, Traci Burton, Elizabeth Bustamante, Anastasio Bustamante, Mario Bustamante- Ramirez, Angelite Butler, Dorothy Ann Calcaterra, Lee Calderon, Robert Callahan, Sheila Campbell, Evelyn Campolo, John Campos, Maria Canacaris, Boonyuen Canacaris, Constantinos Capanda, Melissa Caperell, Martin Cardona, Jaime Cardona, Pedro Carney, Susie Carpenter, John Carr, Lester Carr, Teresa Carrasco, Bernardino Carter, Truman Casto,	Glen J Lerner <i>Retained</i> 7028771500(W)

Xandra Caudle, Spence Causey,  
 Margaret Ceballos, Xavier Cedeno,  
 Robert Celano, Helayne Celano,  
 Vincent Centeno, Dinora Cepeda,  
 Guadalupe Chase, Roy Chea,  
 Caridad Chevez, Elsa Chiger, Mark Childs,  
 Lucille Circle, Donald Clark, Alicia Clark,  
 Carol Clark, Patricia Coiro,  
 Richard Collins, Percell Compton,  
 Robert Conner, Ernest Cook, Cliff Corey,  
 Susan Correa, Patricia Coulombe, Paul  
 A Crawford, Amber Crocker,  
 Ronald Crockett, Pamela Cross,  
 Howard Crossley, Rosslyn Daniels, William  
 R Davis, Evelyn Davis, Mary Jean Davis,  
 Virginia A Dawson, Jessie L Delacruz,  
 Denise M Delacruz, Emelyn Deras,  
 Silvia Derosé, Gregory Devine,  
 Sherida Diamond, Claire Diaz-Perez,  
 Jose Di Pietro, Mark Dixon, Otis L Dolpies,  
 Emilio Domingo, Tamara Dominguez,  
 Pamela Domkoski, Eugena Donato,  
 Joseph Donis, Hugo Donley, Patricia  
 L Draganic, Ljubica Duck, Deloris K Duhs,  
 Kathleen J Duncan, Lillian Dusyk,  
 Harold Dyer, Allyson R Easley,  
 Lois Echeverria, Deisy Edmond, Donnedia  
 D Elauria, Roland E Escala, Dario E Escala,  
 Engarcia B Escalera, Kathy A Escobedo,  
 Maria Espinosa, Teresa I Esposito, Ernest  
 A Evans, Leon Evans, Williams Eversole,  
 John J Faulkner, Mary Feingold,  
 Abraham Feingold, Muriel Fennell,  
 Oscar Ferguson, Murietta Ferguson,  
 Willie Ferrante, Daniel Ficklin,  
 Carolyn Filbeck, Joe Fineberg, Ethel Finn,  
 Madeline C Fitch, Albert L Flores,  
 Adrian Flores, Maria Folkenflik,  
 Ronald Foremaster, Rauna Foster, Joseph  
 E Foster, Phyllis G Frazier, Cynthia  
 D Freeman, Victoria Friel,  
 Lawrence Friesen, Bonita M Frillarte,  
 Ness Frisby, Nancy C Gaines,  
 Jodi Gallegos, Esperanza Gallegos,  
 Neohmi Garay, Luis Garcia, Brenda Garcia,  
 Martha Gardner, Sandra Garvey,  
 Michael Gass, Lois Gellens,  
 Jeremy Geoghegan, Marion George,  
 Theresa Giannopoulos, Aris Giannopoulos,  
 Tina Gilbert, Wanda Glenn,  
 Gregory Golden, Jean Golden-Lewis,  
 Tyra Golob, Luciano Gomez-Carrillo,  
 Margarito Gonzales, Pastor Gonzalez-  
 Torres, Jesus Gordy, TJ Gotlieb,  
 Jeff Goudy, Allen Graham,  
 Annetta Grattan, Bill Gray, Arnold Gray,  
 Bonnie Green, Dorothy Green,  
 Tania Gregorich, Roy Gresser,  
 Jeffrey Griffin, Willie Grimblot,  
 Robert Grimes, Verna Grimm,  
 Cynthia Grimm, Robert Gronna,  
 Patrick Guerette, Carl Guevara,  
 Candelario Gulli, Nicholas Gutierrez,  
 Julia Hachez, Denise F Hadjes, Sue Hal,  
 Esther I Hall, Frank J Hall, Tina Hamblin,  
 Chardai C Hamilton, Robert Hancock,  
 Deborah Haro, Jessica M Harper,  
 Joann Harrington, Anna C Harrington,  
 Michael S Harris, Dorris Harrison,  
 Glorice Harrison, Shara Harrison-Carter,  
 Patricia Harshman-Talbert, Brianna  
 S Hartley, Ronald K Harwood,  
 Robert Haugen-Rattazzi, Linda K Hayashi,  
 Esther A Hayes, Samuel Hein, Susette  
 A Henderson-Shepherd, Nita Hennick, Roy  
 M Henson, Juanita Heredia,  
 Lucia Hernandez, Candido Hernandez,  
 Marcial A Hernandez, Maria Herrold,  
 Thomas Herron, Luz Hill, Susan M Hiner,  
 Isheka Hoard, Arlene Hobbs, Beth Hollis,  
 Michelle Holmes, Jaqueline A Hooker,  
 Joshua Hoover, Willie Hoppins,  
 Patricia Horvath, Belvia Horvath,  
 James Hostler, Anna Houle,

Augustave Hovietz, Carl Howard,  
 Ruth Howell, Robert E Howford,  
 Michelle Huebner, Edward L Hughes,  
 Lovette M Hunter, Virginia M Hurtado-  
 Miguel, Patricia Hwang, Ho Nan Hyyppa,  
 Angela Ibarra, Janette Infuso,  
 Joseph Interdonati, Frank Irely,  
 Brian Jackson, Barry Jackson,  
 Cecil Jackson, Dora Jaramillo,  
 Rolando Jiles, Letha Jiles,  
 Richard Johnson, Clifton Johnson,  
 Doris Johnson, Eugene Johnson,  
 Johnny Johnson, Joyce Johnson,  
 William Jones, Arnold Kabadaian,  
 Ann Kaleta, Anthony K Kapoor,  
 Arun Keeler, Linda J Keeling,  
 Sharon Kelly, Michael F Keyes, Rayann  
 J Kidd, Darrell Kim, Connie Kim, Soo-  
 ok Kim, Taesook Kimbers, Sondra  
 I Kindler, Elizabeth I King, Iris L King,  
 Larry D Kocejka, Raymond E Koenen,  
 Tracey Koenig, Joanna Koh,  
 Patrick Kopanski, Michael Krachenfels,  
 Michael J Kramer, Corinne M Kroitor,  
 David Kunik, Olga Kunzig, Karen  
 A LaFountain, Aneita Lake,  
 Barbara Lampman, Krystal Lang,  
 Darsel Larson, Jonathan Laurel,  
 Bertha Lauron, Anges G Lawson,  
 Marie LeBlanc, Phyllis Leeman-Ross, Betty  
 J LeTang, Arlene Lev, Jane Lewis, James  
 A Liebschutz, Joan Lim, Minerva L Limes,  
 Debra Lindsey, Edward Linetsky,  
 Seth Lista, Emilio D Little,  
 William Livingston-Steel, Dorothy Lopez,  
 Felisa Lopez, Iraida Lopez, Martha Lopez,  
 Noe Lopez, Toney E LoPresto, Francine  
 R Lucas, Florence Luther, Darlene Lyles,  
 Frank L Maclean, Sterphanie Madrid,  
 Deborah Magill, Lori Maiwand,  
 Marwa Major, Dorothy J Maldonado,  
 Marguerite Maldonado, Mario Malwitz,  
 Ida Manuel, Audrey Mares, Gabriel Marohl,  
 Robert Marquez, Carol A Martigani,  
 Brenada Martin Lee, Terri L Martin, Leonard  
 A Martin, Terri A Martinez, Hugo Martinez,  
 Jorge B Martinez, Jose Marzulli,  
 Grace Mascari, Mary Louise Mastrian,  
 Lucy Matti, Fatin Mays, Leroy Mays,  
 Lisa McCall, Terry McCall, Virginia  
 A McClain, Letta McClinton,  
 Alfred McCray, Stella McDaniel,  
 Laurence McDavid, John McDonald,  
 David McDonnell, Dolores McGee, Denise  
 Anne McKinney, Mae McKnight,  
 Janet McMillen, Fred Meacham,  
 Myron Mejia, Kelley Mekhijian, Aida  
 A Mellor, Chelsey L Mendoza,  
 Jiggerson Merrell-Clapp, Susan Middaugh,  
 James Milburn, Sylvia Miller,  
 Corinne Mitchell, Gerald Mitchell,  
 Janice Mitchell, Oliver Mizhiritsky,  
 Mikhail Molitor, Kirk Moody, Steven Moore,  
 Mary Mora, Jose Morales,  
 Yolanda Morales-Castro,  
 Elizabeth MorCiglio, Yolanda Moreno,  
 Bivetta Moretensen, Dan R Morgan,  
 David Morgan, Denise M Morgan,  
 Douglas Morgan, Sonia Morici,  
 Andrew Morris, Barry Morris,  
 James Morris, Juanita E Morse,  
 Michele Mosqueda, Migdalia Motola,  
 Andrea Muna, Annie Munger, Judith  
 A Munguia, Lucila Muranyi, Diane Murray,  
 Willie Muscara, Dioselina Nagy,  
 Joseph Najarro, Jose A Nakoneczny,  
 Bonnie Nanod, Thang Natinga,  
 Erlinda Navarro-Ortiz, Maria Nelson,  
 LeeAnne Nevins, Daniel Newell,  
 Lanita Noga, Paul Norlin,  
 Rosemarie Novotny, Ronalee Nyden,  
 Marshall O'Connell, Joseph O'Farrell, Lucio  
 F O'Halloran, Shawn O'Mara, John O'Neal,  
 Norma J Obershaw, Wade Oku,

Andrew Oliva, Digna Orcullo,  
Linda Orozco-Galan, Paula Pacheco,  
Angela Pankhurst, Denis Paratore,  
Matt Park, Robert Parkinson, Kathy Pazos,  
Jesus Pearce, Marilyn Peccorini,  
Teresa Pedro, Phyllis Pena, Jose  
O Peoples, Patricia Perdomo, Delmy  
C Perez, Dora Perez, Louise Perez,  
Luis Perez, Maria Perez, Mercedes Perez-  
Roque, Agustin Perret, Andre Perry, Janet  
P Peterson, Alan K Philip, Lowell Philip,  
Michelle Picard, Craig Pinsker,  
Donald Pitman, Jason B Pittman,  
Wayne Podrouzek, Jeff Polillo,  
Roger Polinski, Ron Porter,  
Judy Pourteymaur, Mohammed Powers,  
Donna Powers, Eva Powers,  
Jennifer Price, Douglas Price, Ivor Prieto,  
Jose Prieto, Luisa Prussin, Ely Quintero,  
Francisco Quiroz, Anthony Ray Rabadan,  
Maribel Ragazzo, Mario Ramirez,  
Adriana Ramirez, John Ramirez,  
Raul Ransom, Edward Raposa,  
Robert Rattazzi, Devin Redding, Cantice  
M Reed, Karen Reyes De Medina,  
Celia Reyes, Gabriel Reyes, Helen Reyes,  
Miguel Rice, Michael Roberson,  
Lester Roberts, Barbara Robinson,  
Constance Robinson, Lloyd H Roby,  
Connie Rochester, Antoinette Rodgers,  
Treva Rodgers, Vicki Rodriguez,  
Maria Rodriguez, Nenita Rodriguez,  
Ricardo Rodriguez, Yolanda Rodriguez-  
Ramirez, Jose Rogers,  
Freeman Roggensee, Carole Rojas,  
Sonia Romano, Joseph Rose,  
Jean Ruckey, Gwendolyn Russell,  
Rosetta Saddler, Demetry Salas,  
Janisann Salcedo, Maria Salguero,  
Francisco Sanders, Kerri Sanders,  
Lovie Saunders, Paul Saunders,  
Sherrilyn Sawyer, Danny Schilling,  
Isa Schlappi, Shaun Schroeder,  
Stephen Schulman, Jeffrey Seay,  
Ray Senness, Sandra Sergio,  
Anthony Sforza, Maurice Shanklin,  
Sylvia Shanks, Julie Shearer,  
Douglas Simko, Sandra Sipple,  
Myrtle Skinner, Charles Slater,  
James Slaughter, Jacklyn Slaughter,  
John Slone, John Smith, Catherine Smith,  
Wilbur Snyder, Lila Sobieski,  
Dolores Socorro, Michelle Sommer,  
Wayne Soto, Maria Soussana,  
Vidana Spainhour, Julie Spangler,  
Jessica Sparks, Patricia Sparks,  
Sandra Spellman, Patricia Stanford,  
Jeffrey Stankard, Williams Stanley,  
Ginger Stewart, Rodney Stoklosa,  
Walter Strohecker, Leticia Stromgren,  
Harold Sudo, Mafalda Swain,  
Barbara Tadeo, Norma Tarnowiski,  
Mirka Tarnowski, Ryszard Tash, Roxanne  
E Taylor, Jill Thibeault, Jeanne Titus-  
Pilate, Catherine Topple, Raymond Toribio,  
Dominga Torres, Yadel Townsley, Rita  
M Trafton, Roselyn Tromello,  
Salvatore Tropp, Patricia A Tuckosh,  
Dorothy Turner, Lucy Turner,  
Terry Tuzinski, Robert Unruh,  
William Valls, Jesus Valone, Dianne Vance,  
Gilbert Vandergaag, Hillegonda Velez,  
Henry Villegas, Stella Virgil, Louis Vital-  
Cedeno, Cecilia Volk, Colleen Vorgias,  
Christ Wadlow, William Wagner,  
Betty Walters, John Walton,  
Jason Wampole, Janice Ward,  
Barbara Ward, Gloria Waris,  
Sandra Watkins, Elizabeth Weddington,  
Lester Weisner, Arlene Wheeler,  
Kathryn White, Debra White, Frank  
E White, Serene White, Sharon Wilkins,  
Bridget Williams, Ace K Williams,  
Anthony Williams, Aubrey Williams,

Charles Williams, Cheryl Williams,  
 Mary Williams, Realinda Williams,  
 Willie Wilson, Gary Wilson, Robert Wilt,  
 Steven Winslow, Angela Winterowd,  
 Beverly Winters, Betty Wolf,  
 James Worthy, Derek

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EVENTS & ORDERS OF THE COURT

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	<b>OTHER EVENTS AND HEARINGS</b>
09/27/2018	<b>Complaint</b> <i>Complaint</i>
09/27/2018	<b>Initial Appearance Fee Disclosure</b> <i>Initial Appearance Fee Disclosure</i>
10/02/2018	<b>Summons Electronically Issued - Service Pending</b> <i>Summons</i>
10/02/2018	<b>Summons Electronically Issued - Service Pending</b> <i>Summons</i>
10/02/2018	<b>Summons Electronically Issued - Service Pending</b> <i>Summons</i>
10/02/2018	<b>Summons Electronically Issued - Service Pending</b> <i>Summons</i>

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FINANCIAL INFORMATION

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	<b>Plaintiff All Plaintiffs A781820</b>	
	Total Financial Assessment	19,800.00
	Total Payments and Credits	19,800.00
	<b>Balance Due as of 12/10/2018</b>	<b>0.00</b>
09/27/2018	Transaction Assessment	19,800.00
09/27/2018	Efile Payment      Receipt # 2018-64744-CCCLK      Abadjian, Sossy	(19,800.00)